

11 APR 1989

5HR-12

Mr. William Ilg
Columbus Coated Fabrics
1280 North Grant Avenue
Columbus, Ohio 43201

Re: Notice of Violation
Columbus Coated Fabrics
OHD 004 294 351

Dear Mr. Ilg:

On August 24, 1988, the Ohio Environmental Protection Agency (OEPA), representing the United States Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the compliance status of this facility with respect to the applicable hazardous waste management requirements of RCRA, including the land disposal restrictions of certain spent solvents (F001-F005) and dioxins which became effective on November 8, 1986, and certain hazardous wastes commonly referred to as California List wastes which became effective on July 8, 1987. Regulations are set forth in 40 CFR Part 268 and in revisions to 40 CFR Parts 260-265, 270, and 271.

As a result of the inspection we have determined that the requirements of the land disposal restriction regulations are being violated.

The facility was shipping F-solvent wastes to treatment facilities without attendant or complete notifications to Marine Shole Processors, as required under 40 CFR Part 268.7. Under Part 268.7(a)(1) generators who manage F-solvent wastes which exceed treatment standards (reference 40 CFR Part 268, Subpart D - Treatment Standards) are required to provide a notification for each shipment of wastes to a treatment facility. The notification must contain the following information: EPA hazardous waste number; applicable treatment standard; manifest number; and waste analysis data, where available. The notification must be supplied to the treatment facility as a separate document accompanying the manifest. Please include in your response to this NOV an example of the notification you will supply to Marine Shole Processors.

A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, documentation demonstrating that the above-cited violation has

01 JUN 1989

5HR-12

Mr. William G. Ilg
Environmental Coordinator
Columbus Coated Fabrics
Borden Packaging and
Industrial Products
1280 North Grant Avenue
Columbus, Ohio 43201

Re: Return to Compliance
Columbus Coated Fabrics
OHD 004 294 351

Dear Mr. Ilg:

We have received and reviewed your letter of May 8, 1989, regarding our
Notice of Violation (NOV) dated April 11, 1989.

The information submitted with your letter appears to meet the requirements
of the land disposal restriction regulation found at 40 CFR 268. We have,
therefore, returned this facility to compliance for those violations cited in
our April 11, 1989, NOV.

If you should have any further questions, please contact Ms. Zetta Thomas
of my staff at (312) 886-4581.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

cc: Mike Savage, OEPA
Jennifer Hille, OEPA

bcc: Sally Swanson
Compliance File
Zetta Thomas

27 5/31/89 FRN.
acting
6-1-89

5HR-12:z.THOMAS:or:05/25/89:DISK #1:PC FILENAME:ILG

been corrected and indicating what measures have been initiated to assure future compliance. Failure to correct the violation may subject the facility to further Federal enforcement action.

Thank you for your cooperation. If you have any questions concerning this letter, please contact Zetta Thomas of my staff at (312) 886-4581.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

Enclosure

cc: Mike Savage, OEPA
Jennifer Hille, OEPA

bcc: Sally Swanson
Compliance File

5HR-12:Z.THOMAS:disk #1:or:3-7925:03/31/89:PC FILENAME:ILG

02
4/7/89

RCRA ENFORCE- MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	2/10/89 4/10/89	PPB acting 4-10-89	



State of Ohio Environmental Protection Agency

Central District Office

P.O. Box 1049, 1800 WaterMark Dr.

Columbus, Ohio 43266-0149



Richard F. Celeste
Governor

September 7, 1988

RE: COLUMBUS COATED FABRICS
FRANKLIN COUNTY
OHD004294351/01-25-0145
G - TSD

Mr. William G. Ilg
Environmental Coordinator
Columbus Coated Fabrics
1280 North Grant Avenue
Columbus, Ohio 43201

Dear Mr. Ilg:

On August 24, 1988, the Ohio Environmental Protection Agency inspected Columbus Coated Fabrics for compliance with Ohio's Hazardous Waste Regulations. This facility was inspected for compliance with regulations pertaining to generation and storage of hazardous waste. The following violations were found during the inspection:

1. Inspection Records [40 CFR 265.15(d) and OAC 3745-65-15(D)] - Inspections must be recorded in an inspection log, including the date and nature of any repairs or other remedial actions.

On two occasions, March 27 and April 1, 1988, a leaking drum in the drum storage area was noted in the inspection log. Records do not reflect what remedial actions were taken to address these problems. Please indicate what procedures will be enacted to ensure that remedial actions are noted on future logs.

2. Exception Reporting [40 CFR 262.42 and OAC 3745-52-42] - A generator who does not receive a copy of the manifest from the designated facility within 35 days must contact the transporter and/or designated facility to determine the status of the hazardous waste. An Exception Report must be submitted to the Ohio and U.S. EPA if a copy of the manifest has not been received within 45 days of shipment.

Mr. William G. Ilg
Environmental Coordinator
Columbus Coated Fabrics
Page 2
September 7, 1988

Return copies of manifests were not received for two shipments of waste sent to Safety Kleen's New Castle, Kentucky facility. These shipments were transported from Columbus Coated Fabrics on September 14, 1987 and October 1, 1987. No follow-up was conducted by the facility as to the disposition of this waste. No Exception Report was filed with the Ohio or U.S. EPA.

Please determine the status of these two shipments of waste. All information gathered in your investigation (including copies of manifests) should be provided to the Ohio EPA. Please provide an explanation for why an Exception Report was not filed.

Please indicate what procedures will be enacted to ensure that a follow-up is conducted on future shipments if a return copy of a manifest has not been received within 35 days.

3. Closure Plan [40 CFR 265.112(c) and OCA 3745-66-12(C)] - The owner/operator shall amend the closure plan whenever changes in operating plans or facility design affect the closure plan.

The present closure plan has not been amended since the decommissioning of the solvent still. The closure plan mentions rinsing empty hazardous waste drums with solvent and then recovering the resultant wash water in the solvent still. The closure plan should be amended to include another method for disposing of this rinsewater and the discussion on equipment decontamination for the solvent still can be eliminated.

4. Contingency Plan [40 CFR 265.54(d) and OAC 3745-65-54(D)] - The contingency plan shall be reviewed and immediately amended whenever the list of emergency coordinators changes.

Stan Morris should be removed from the list of emergency coordinators. Please submit documentation that the contingency plan has been revised to include an updated list of emergency coordinators.

5. Contingency Plan [40 CFR 265.53 and OAC 3745-65-53] - A copy of the contingency plan and all revisions to the plan shall be submitted to all local and state emergency service authorities.

Local and state emergency service authorities have a 1985 version of the contingency plan. Please submit documentation that the latest revised contingency plan has been submitted to these authorities.

Enclosed are copies of the RCRA Land Disposal Restriction Checklists. These checklists were completed as part of the inspection. Copies are being forwarded to U.S. EPA, Region V for appropriate follow-up.

Mr. William G. Ilg
Environmental Coordinator
Columbus Coated Fabrics
Page 2
September 7, 1988

Please submit documentation of correction of these violations to this office by October 10, 1988. A copy of the inspection has been included for your records. If you have any questions, feel free to call our office at (614) 644-2055.

Sincerely,



Jennifer Hille
Division of Solid & Hazardous Waste Management
Central District Office

JH/sc

Enclosures

cc: Dave Sholtis, DSHWM, CO

0009m/7-9

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Columbus Coated Fabrics

U.S. EPA I.D. No.: OHD004294351

Street: 1280 North Grant Avenue

City: Columbus State: Ohio Zip Code: 43201

Telephone: (614) 297-6043

Operator: Columbus Coated Fabrics

Street: 1280 North Grant Avenue

City: Columbus State: Ohio Zip Code: 43201

Telephone: (614) 297-6043

Owner: Borden Inc., Division of Borden Chemical

Street: 180 East Broad Street

City: Columbus State: Ohio Zip Code: 43215

Telephone: (614) 225-4000

Inspection Date: 8/24/88 Time: 9.00 AM Weather Conditions: 82° Sunny

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Inspectors:	<u>Jennifer Hille</u>	<u>Ohio EPA</u>	<u>(614) 644-2055</u>

Facility Representatives: William Ilg (614) 297-6043

	<u>RCRA Status</u>	<u>F-Solvent</u>	<u>LDR Status</u> <u>California List</u>
Generator	<u>Large Quantity</u>	<u>F005</u>	<u></u>
Transporter	<u></u>	<u></u>	<u></u>
Treater	<u></u>	<u></u>	<u></u>
Storer	<u>Federal Part B</u>	<u>F005</u>	<u></u>
Disposer	<u></u>	<u></u>	<u></u>

INSPECTION SUMMARY

Site Activity:

- Production of vinyl sheeting for wall paper and other products; printing of wall paper patterns on vinyl sheeting; manufacture various grades of vinyl sheeting for a variety of uses; electroplating operation chrome plated cyliners used for printing wall paper.

Waste Handling:

- F006, D007 chrome plating sludge picked up by Goodman Sanitation from limestone pit at electroplating shop.
- F005/D001 waste ink and waste from cleaning printing equipment. MEK is the solvent. The solvent sludge from cleaning the printing equipment may also be classified as K086.
- D006/D008 waste plasticizer contaminated at banbury mixers. The plasticizer is used now in place of oil since a significant portion of contaminated plasticizer can be used as an ingredient to other products such as "firewall." They only need to dispose of excess quantities.
- D001 solid or liquid urethane coating for vinyl sheeting.

**RCRA LAND DISPOSAL RESTRICTION INSPECTION
APPLICABILITY CHECKLIST**

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	<u>F-Solvent Wastes</u>					
1.	F001	_____	_____	_____	_____	_____
2.	F002	_____	_____	_____	_____	_____
3.	F003	_____	_____	_____	_____	_____
4.	F004	_____	_____	_____	_____	_____
5.	F005	<u> X </u>	_____	<u> X </u>	_____	_____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	_____	_____	_____	_____	_____
Cadmium	100 mg/L	_____	_____	_____	_____	_____
Chromium VI	500 mg/L	_____	_____	_____	_____	_____
Lead	500 mg/L	_____	_____	_____	_____	_____
Mercury	20 mg/L	_____	_____	_____	_____	_____
Nickel	134 mg/L	_____	_____	_____	_____	_____
Selenium	100 mg/L	_____	_____	_____	_____	_____
Thallium	130 mg/L	_____	_____	_____	_____	_____

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
_____	_____	_____	_____	_____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm _____

500 ppm _____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

_____ Yes _____ No _____ NA

If yes, state reasons for mixing:

5. Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L (dilute HOC wastewater) and less than 10,000 mg/L

Note: The prohibitions of 268.32(a)(3) and (e) do not apply if the HOC waste is also subject to the solvent restrictions of 268 Subpart C or a specific HOC.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes ☐ No ☐ NA

If yes, check the appropriate treatability group.

- ☐ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
☐ Pharmaceutical wastewater containing spent methylene chloride
☒ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

☐ Yes ☐ No ☒ NA

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

☐ Yes ☐ No ☒ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

B. Waste Analysis**1. F-Solvent Wastes**

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

☒ Yes ☐ No ☐ NA

How was this determination made?

- Knowledge of waste

☒ Yes ☐ No

If yes, note how this is adequate: Solvent used is 90% MEK, 10% MIBK

- TCLP

☐ Yes ☐ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes ☐ No ☐ NA

If yes, specify the waste stream: MEK cleanup solvent

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

Processes have not changed

2. California List Wastes

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☐ Yes ☐ No ☒ NA

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

_____ Yes _____ No X NA

What type of absorbent is used? _____
Check the types of waste to which absorbent is added.

_____ Liquid hazardous waste having a pH less than or equal to 2

_____ Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L

_____ Liquid hazardous waste containing metals

_____ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

_____ Yes _____ No X NA

If yes, note how this is adequate: _____

- Testing

_____ Yes _____ No X NA

If yes, list test method used: _____

- d. Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels?

_____ Yes _____ No X NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No X NA

C. Management

1. On-Site Management

Is waste that exceeds the treatment standards treated, stored, or disposed on-site?

 X Yes No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

 X Yes No

If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

 X Yes X No *

If yes, does notification contain the following?

EPA Hazardous waste number(s)	<u> X </u> Yes	<u> </u> No
Applicable treatment standards	<u> X </u> Yes	<u> </u> No
Manifest number	<u> X </u> Yes	<u> </u> No
Waste analysis data, if available	<u> </u> Yes	<u> X </u> No

Identify off-site treatment or storage facilities: Production Fuels of Arkansas; Marine Shale Processors, Morgan City, LA; Safety Kleen, Dolton, IL.

- b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

 Yes X No

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

 Yes No

* Notice was sent to Production Fuels and to Safety Kleen but not to Marine Shale.

If yes, does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Certification that the waste meets treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site land disposal facilities: _____

- c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

☐ Yes ☐ No ☒ NA

D. Treatment Using RCRA 264/265 Exempt Units or Processes
 (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

☐ Yes ☒ No

If yes, list types of waste treatment units and processes:

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

o F-solvent ☒ Yes ☐ No ☐ NA
o California List ☐ Yes ☐ No ☒ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

☒ Yes ☐ No

- a. What date was the waste analysis plan last revised? June, 1988

- b. Are analyses conducted on-site or off-site?

☐ On-site ☒ Off-site

Identify off-site lab: Stilson Laboratories - Columbus, Ohio

- c. Is F-solvent waste analyzed using TCLP?

☒ Yes ☐ No ☐ NA

- d. Describe the frequency of sampling: _____

- e. Describe procedures used to identify manifest discrepancies:
No off-site waste accepted.

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

☒ Yes ☐ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

☒ Yes ☐ No

If no, go to C, Treatment in Surface Impoundments.

2. If yes, check the appropriate method.

☐ Tanks
☒ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

☒ Yes ☐ No ☐ NA

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

☒ Yes ☐ No

5. Do operating records agree with container labeling?

☒ Yes ☐ No ☐ NA

6. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

☐ Yes ☒ No ☐ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

☐ Yes ☐ No

If yes, state how:

7. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

_____ Yes _____ No X NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

_____ Yes _____ No

8. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

_____ Yes _____ No X NA

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

_____ Yes X No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]?

_____ Yes _____ No

4. Describe frequency of testing treatment residuals:

5. Is dilution used as a substitute for treatment?

_____ Yes _____ No

6. Are notifications prepared by the generators kept in the facility's operating record?
 _____ Yes _____ No
7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?
 _____ Yes _____ No _____ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

_____ Yes _____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	_____ Yes	_____ No
Applicable treatment standards	_____ Yes	_____ No
Manifest number	_____ Yes	_____ No
Waste analysis data, if available	_____ Yes	_____ No
Certification that the waste meets the treatment standards	_____ Yes	_____ No

Identify off-site disposal facilities: _____

D. Treatment in Surface Impoundments

1. Are restricted wastes placed in surface impoundments for treatment?
 _____ Yes X No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

_____ Yes _____ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

_____ Yes _____ No

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

_____ Yes _____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41?

_____ Yes _____ No

6. Provide the frequency of analyses conducted on treatment residues: _____

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

_____ Yes _____ No

8. Are the hazardous waste residues that exceed the treatment standards (268.41) removed adequately and on an annual basis?

Sludge _____ Yes _____ No

Supernatant _____ Yes _____ No

- a. If no, and supernatant is determined to exceed treatment concentrations, is annual volume of liquid flowing through the impoundment greater than the impoundment volume?

_____ Yes _____ No

- b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

_____ Yes _____ No

- c. Are residues subsequently managed in another surface impoundment? _____ Yes _____ No

- d. Are residues treated prior to disposal?

_____ Yes _____ No

If yes, are waste residues treated on-site or off-site?

_____ On-site _____ Off-site

Identify treatment method: _____

E. Land Disposal

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

_____ Yes _____ X No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: _____

2. Does the facility operating record have notices and certifications from generators/storer/treaters [268.7(c); 268.7(a),(b)]?

_____ Yes _____ No

3. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

_____ Yes _____ No

If yes, at what frequency? _____

4. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

_____ Yes _____ No

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

_____ Yes _____ No

If yes, are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection)?

_____ Yes _____ No

6. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

_____ Yes _____ No _____ NA

7. What is the volume of the restricted wastes disposed of to date?

8. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

_____ Yes _____ No _____ NA

APPENDIX A

SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
trichloroethylene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
methylene chloride	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
1,1,1-trichloroethane	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
carbon tetrachloride	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
chlorinated fluorocarbons	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
trichloroethylene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
methylene chloride	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
1,1,1-trichloroethane	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
chlorobenzene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
trichlorofluoromethane	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
1,1,2-trichloro-1,2,2-trifluoroethane	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
ortho-dichlorobenzene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
acetone	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
ethyl acetate	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
ethyl benzene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
ethyl ether	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
methyl isobutyl ketone	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
n-butyl alcohol	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
cyclohexanone	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
methanol	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

If the F003 waste stream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic?

☐ Yes ☐ No

- cresols and cresylic acid _____ Yes X No
nitrobenzene _____ Yes X No

- | | | | | |
|---------------------|---------------|-----|---------------|----|
| toluene | <u> </u> | Yes | <u> X </u> | No |
| methyl ethyl ketone | <u> X </u> | Yes | <u> </u> | No |
| carbon disulfide | <u> </u> | Yes | <u> X </u> | No |
| isobutanol | <u> </u> | Yes | <u> X </u> | No |
| pyridine | <u> </u> | Yes | <u> X </u> | No |

- (a) Are the constituents used as chemical carriers? Yes ☒ No

.....

- If yes, list the constituents.

(c) Are the constituents used as diluents? Yes X No

.....

- Revised 11-03-87

If yes, list the constituents.

(e) Are the constituents used for fabric scouring?

___ Yes X No

If yes, list the constituents.

(f) Are the constituents used as reaction and synthesis media?

___ Yes X No

If yes, list the constituents.

If the responses to questions 1 through 6 led the inspector to believe that the waste may be an F-solvent, answer question 7.

7. Are any of the above constituents spent solvents? (A solvent is considered "spent" when it has been used and is no longer usable without being regenerated, reclaimed, or otherwise reprocessed.)

X Yes ___ No

8. If the waste is a mixture of constituents as determined in questions 1 through 6, give the concentration before use of all the constituents in the solvent mixture/blend. For example:

5%	methylene chloride
2%	trichloroethylene
25%	1,1,1-trichloroethane
<u>68%</u>	mineral spirits
100%	

If the waste stream is a mixture containing a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

With respect to the F003 solvent wastes, if, before use, the waste stream is mixed and contains only F003 constituents, it is a listed waste. For example:

33%	acetone
16%	methanol
<u>51%</u>	ethyl ether
100%	

If the waste stream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste. For example:

50%	xylene (F003)
12%	TCE (F001)
<u>38%</u>	mineral spirits
100%	

If in light of the above, the handler appears to be generating F001 - F005 hazardous wastes, refer this facility to the enforcement official for followup actions verifying the use of solvents at the facility.

Wastes shipped to:

TSD NAME LOCATION EPA ID NO.	TYPE OF FACILITY T/D METHODS	WASTE CODE	WASTE QUANTITY	COMMENTS (shipment dates, waste descriptions, etc.)
Marine Shale Processor, Inc. Rural Route #5, Box 756 Morgan City, LA 70380 LAD981057706	recycling	F005 D001 D005 D006	84 drums	9/23/87 waste flammable solid 1/27/88 waste flammable solid
Production Fuels of Arkansas Benton, Arkansas 72015 ARD981057870	cement kiln	F005 D001 D005 D006	53 drums	6/23/88 waste flammable solid

August 24, 1988 9:00 AM

Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB #

GENERAL INFORMATION

U.S. EPA I.D. # OHD004294351

Facility: Columbus Coated Fabrics Address: 1280 North Grant Avenue City: Columbus
State: Ohio Zip Code: 43201 County: Franklin Telephone: (614) 297-6043

INSPECTION PARTICIPANT(S)

(Name)	(Title)	(Telephone)
1. William Ilg	Environmental Coordinator	(614) 297-6043
2.		
3.		

INSPECTOR(S)

1. Jennifer Hille	Environmental Engineer	(614) 644-2055
2.		
3.		

INSTALLATION ACTIVITY

Mark One

If the site is a TSDF, check the boxes indicating which areas were reviewed.

☐ Generator only (G)

☒ General Facility Standards, Preparedness
and Prevention, Contingency and Emergency
Manifests/Records/Reporting, Closure

☐ Waste Piles S03

☐ Transporter (T)

☐ Land Treatment D01

☐ TSDF only

☒ Containers S01

☐ Landfills D00

☐ G-T

☐ Tanks S02/T01

☐ Chemical/Physical/
Biological T04

☒ G-TSDF

☐ Surface Impoundments S04/T02

☐ Groundwater Monitoring

☐ T-TSDF

☐ Incineration/Thermal Treatment

☐ Post-Closure

☐ G-T-TSDF

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Has the facility submitted a Part A to Ohio?	<u>X</u>	—	—	—
2. If "yes", is it complete and accurate?	<u>X</u>	—	—	—
3. Has the facility submitted a Part B?	<u>X</u>	—	—	<u>No. 2</u>
4. Was advance notice of the inspection given? If so, how far in advance?	<u>X</u>	—	—	<u>No. 1</u>

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

No. 1: One week's notice was given.

Site Activity: - Production of vinyl sheeting for wall paper and other products; printing of wall paper patterns on vinyl sheeting; manufacture various grades of vinyl sheeting for a variety of uses; electroplating operation chrome plated cylinders used for printing wall paper.

Waste Handling: - F006, D007 chrome plating sludge picked up by Goodman Sanitation from limestone pit at electroplating shop.

- F005/D001 waste ink and waste from cleaning printing equipment. MEK is the solvent. The solvent sludge from cleaning the printing equipment may also be classified as K086.

- D006/D008 waste plasticizer contaminated at banbury mixers. The plasticizer is used now in place of oil since a significant portion of contaminated plasticizer can be used as an ingredient to other products such as "firewall." They only need to dispose of excess quantities.

- D001 solid or liquid urethane coating for vinyl sheeting.

No. 2: Facility has a Federal Part B, however, present operations differ from the permit in that a new D001 waste is being handled and the distillation equipment has been removed which affects the contingency plan and closure plan.

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]	<u>X</u>	---	---	---
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?	---	<u>X</u>	---	---
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10) [3745-65-01]	---	<u>X</u>	---	---
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].	<u>X</u>	---	---	---
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].	<u>X</u>	---	---	---
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].	<u>X</u>	---	---	---
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].	---	<u>X</u>	---	No. 1
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]	<u>X</u>	---	---	---

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32]	<u>X</u>			
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) <u>or less</u> is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32].	<u>X</u>			
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33].	<u>X</u>			
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]			<u>X</u>	
7. If the generator elects to store hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".	<u>X</u>			
b) The date that accumulation began is clearly marked on each container.	<u>X</u>			
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Section 262.34) [3745-52-34(A)(4)]	<u>X</u>			
9. The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)].	<u>X</u>			

RCRA INTERIM STATUS INSPECTION FORM

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS

No. 1: Return copies of two manifests for shipments sent to Safety Kleen's New Castle, Kentucky facility are missing. The shipments were sent on September 14, 1987 and October 1, 1987.

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 265 (OAC 3745-65-et seq.) GENERAL INTERIM STATUS REQUIREMENTS AND TSD REQUIREMENTS

Yes No N/A Remark #

Subpart B: General Facility Standards

1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a) [3745-65-13(A)(1)]

X — — —

2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste.
(Section 265.13(b)) [3745-65-13(B)]

X — — —

3. a) Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility?
(265.14(a)(1)) [3745-65-14(A)(1)]

X — — —

b) Would disturbance of the waste cause a violation of the hazardous waste regulations? (265.14(a)(2)) [3745-65-14(A)(2)]

X — — —

IF BOTH 3a AND 3b ARE "NO", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".

4. The facility has -

a) A 24-hour surveillance system, or

X — — —

b) An artificial or natural barrier and a means to control entry at all times (265.14(b)(2)). [3745-65-14(B)(2)(a and b)]

X — — —

5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265-14(c)) [3745-65-14(C)]

X — — —

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. a) The operator has developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15) [3745-65-15]	<u> </u>	<u> X </u>	<u> </u>	<u>No. 1</u>
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)) [3745-65-15(B)(4)]	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. [3745-65-16(A)(B)(C)]	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records. [3745-65-16(D)(E)]	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements: (Section 265.17) [3745-65-17]				
a) Protection from sources of ignition.	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
b) Physical separation of incompatible waste materials.	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b). [3745-65-17(B)]	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
No. 1: On two occasions, it was noted on the inspection log that a leaking drum was found but there is no indication as to what action was taken.				

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31] X
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]
 - a) Internal alarm system. X
 - b) Access to telephone, radio or other device for summoning emergency assistance. X
 - c) Portable fire control equipment. X
 - d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers. X
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33] X
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34] X
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35] X
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)] X
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)] X

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:
 - a) Actions to be taken by personnel in the event of an emergency incident. X --- --- ---
 - b) Arrangements or agreements with local or state emergency authorities. X --- --- ---
 - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator. X --- --- ---
 - d) A list of all emergency equipment including location, physical description and outline of capabilities. X --- --- ---
 - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)] X --- --- ---
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)] --- X --- No. 1
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54] --- X --- No. 2
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55] X --- --- ---
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)] --- --- X ---

No. 1: Local and state emergency service authorities have a 1985 version of the contingency plan.

No. 2: Stan Morris needs to be removed from the emergency notification list on pages 63 and 64.

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. The operator maintains a written operating record at his facility as required by Section 265.73 [3745-65-73(A)] which contains the following information:
 - a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment, storage or disposal. (265.73(b)(1)) [3745-65-73(B)(1)]

	<u>X</u>	___	___	
--	----------	-----	-----	--
 - b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).

	<u>X</u>	___	___	
--	----------	-----	-----	--
 - c) The estimated (or actual) weight, volume or density of the waste material(s).

	<u>X</u>	___	___	
--	----------	-----	-----	--
 - d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).

	<u>X</u>	___	___	
--	----------	-----	-----	--
 - e) The present physical location of each hazardous waste within the facility.

	<u>X</u>	___	___	
--	----------	-----	-----	--
 - f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)) [3745-65-73(B)(2)]

	___	___	<u>X</u>	
--	-----	-----	----------	--
 - g) Records of any waste analyses and trial tests required to be performed.

	<u>X</u>	___	___	
--	----------	-----	-----	--
 - h) Records of the inspections required under Section 265.15 [3745.65.14] (General Inspection Requirements - Subpart B).

	<u>X</u>	___	___	
--	----------	-----	-----	--
 - i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6). [3745-65-73(B)(6)]

	___	___	<u>X</u>	
--	-----	-----	----------	--
 - j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.

	<u>X</u>	___	___	
--	----------	-----	-----	--

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75. [3745-65-75]

X _____ _____ _____

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71) [3745-65-71(A)]

_____ _____ X _____

- a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)) [3745-65-71(B)]

_____ _____ X _____

- b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) [3745-65-72(A)] are noted in writing on the manifest document. (265.71(a)(2)) [3745-65-71(A)(2)]

_____ _____ X _____

4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director. [3745-65-72(B)]

_____ _____ X _____

5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days. [3745-65-76(A)]

_____ _____ X _____

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

- | | | | | |
|---|----------|----------|----------|--------------|
| 1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112) [3745-66-12] | <u>X</u> | _____ | _____ | _____ |
| a) A description of how and when the facility will be closed.
(265.112(a)(1)) [3745-66-12(A)(1)] | <u>X</u> | _____ | _____ | _____ |
| b) A description of how any of the <u>applicable</u> closure requirements in other Subparts of Section 265 [3745-66] (Tanks, Surface Impoundments, Landfill, etc.) will be carried out. | <u>X</u> | _____ | _____ | _____ |
| c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.) | <u>X</u> | _____ | _____ | <u>No. 1</u> |
| d) A description of steps taken to decontaminate facility equipment. | <u>X</u> | _____ | _____ | _____ |
| e) The year closure is expected to begin and a schedule for the various phases of closure. | <u>X</u> | _____ | _____ | _____ |
| 2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates. (265.112(4)(B)) [3745-66-12(B)] | _____ | <u>X</u> | _____ | <u>No. 2</u> |
| 3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process. (265.112(4)(C)) [3745-66-12(C)] | _____ | _____ | <u>X</u> | _____ |

No. 1: The maximum inventory in the closure plan agrees with the Federal Part B permit. However, Ohio's permit only allows a maximum inventory of 10,450 gallons.

No. 2: The closure plan should be updated to reflect that the distilling equipment has been removed.

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart H: Financial Requirements

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143) [3745-66-43]
 - a) A closure trust fund, or
 - b) A surety bond, or
 - c) A closure letter of credit, or
 - d) A combination of financial mechanisms. X No. 1
2. A written cost estimate for closure of the facility (as specified in the closure plan) is available. How much is it? X \$80,000
3. When was the most recent estimate made? X March 31, 1988
4. A written cost estimate for post closure care of the facility (if applicable) is available. How much is it? X
5. When was the most recent estimate made? X

REMARKS, GENERAL INTERIM STATUS REQUIREMENTS

No. 1: The financial test was used.

RCRA INTERIM STATUS INSPECTION FORM

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173) [3745-66-73(A)]	<u>X</u>	___	___	___
b) In good physical condition (265.171) [3745-66-71]	<u>X</u>	___	___	___
c) Compatible with the wastes stored in them (265.172) [3745-66-72]	<u>X</u>	___	___	___
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)]	<u>X</u>	___	___	___
3. Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)]	<u>X</u>	___	___	___
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) [3745-66-74]	<u>X</u>	___	___	___
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76]	<u>X</u>	___	___	___
6. Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)]	<u>X</u>	___	___	___

Encl. F2

27 JUN 1988

5HS-12

Mr. William Ilg
Columbus Coated Fabrics
1280 North Grant Avenue
Columbus, Ohio 43201

RE: Return to Compliance
Columbus Coated Fabrics
OHD 004 294 351

Dear Mr. Ilg:

We have received and reviewed your letter of June 10, 1988, regarding our Notice of Violation (NOV) dated February 18, 1988.

The information submitted with your letter appears to meet the requirements of the land disposal restriction regulation found at 40 CFR Part 268. We have, therefore, returned this facility to compliance for those violations cited in our February 18, 1988, NOV.

If you should have any further questions, please contact Mr. Paul Little of my staff at (312) 886-8096.

Sincerely yours,

Sally K. Swanson, Acting Chief
RCRA Enforcement Branch

cc: Mike Savage, OEPA
William Schneider, OEPA-CDO

bcc: Sally Swanson, REB

5HS-12:RCRA:P.LITTLE lt:6/22/88:disk FORM

P2 6.22.88

jud for 6/21/88
sks

18 FEB 1988

Failure to correct the violations may subject the facility to further Federal enforcement action. If you have any questions regarding this

10-1-88
b1
b7C
b7D
Mr. William Ilg
Columbus Coated Fabrics
1280 North Grant Avenue
Columbus, Ohio 43201

WILLIAM E. MUNO

William E. Muno, Chief
RCRA Enforcement Branch

Re: Notice of Violation
Columbus Coated Fabrics
OHD 004 294 351

Dear Mr. Ilg:

Enclosure

On September 2, 1987, the Ohio Environmental Protection Agency, representing the United States Environmental Protection Agency (U.S. EPA), inspected the above facility. The purpose of the inspection was to determine the facility's compliance with the land disposal restrictions of certain spent solvents which became effective on November 8, 1986; reference 51 Federal Register 40636, 40 CFR Part 268, and revisions to 40 CFR Parts 260-265 and 270. A copy of the inspection report is enclosed for your information.

SHE-12:PLITTLE:fer:6-8096:1-26-88:DISK #1

As a result of the inspection, we have determined that the subject facility violates certain land disposal restriction regulations. The specific violations are noted in the following:

The facility did not revise its waste analysis plan to meet the requirements of 40 CFR Part 268, as required under 40 CFR Part 264.13. Waste analysis plans must contain all the information which must be known to treat, store, or dispose of the waste in accordance with the requirements of 40 CFR Parts 264.13, and 268.

You are hereby requested to submit to U.S. EPA within thirty (30) calendar from the date of this letter a written description, with supporting documentation, of the actions taken to correct the aforementioned violations.

- 2 -

Failure to correct the violations may subject the facility to further Federal enforcement action. If you have any questions regarding this letter, please contact Mr. Paul Little of my staff at (312) 886-8096.

Sincerely yours,

ORIGINAL SIGNED BY:

WILLIAM E. MUNO

William E. Muno, Chief
RCRA Enforcement Branch

Enclosure

cc: Mike Savage, OEPA
William Schneider, OEPA-CDO

bcc: Sally Swanson, REB
Paul Little, REB

SHS-12:PLITTLE:fer:6-8096:1-26-88:Disk #1

As a result of the inspection, we have determined that the subject facility violates certain land disposal restriction regulations. The specific violations are noted in the following:

	TYPIST	AUTHOR	OTHER STAFF	UNIT CHIEF	SECT. SEC'Y	SECT. CHIEF	OTHER CHIEF	UNIT DIR
INT. DATE	2-9 fer			SJS 2-16-88		WEM 2/17/88		



State of Ohio Environmental Protection Agency

Central District Office

P.O. Box 1049, 1800 WaterMark Dr.

Columbus, Ohio 43266-0149

RECEIVED
OHIO EPA

SEP 9 1987

DIV. of SOLID & HAZ. WASTE MGT.



Richard F. Celeste
Governor

September 8, 1987

RE: COLUMBUS COATED FABRICS
FRANKLIN COUNTY
OHD004294351/01-25-0145
G - TSD

Mr. William Ilg
Senior Project Engineer
Columbus Coated Fabrics
1280 North Grant Avenue
Columbus, Ohio 43201

Dear Mr. Ilg:

Thank you for accompanying me during the Land Disposal Restriction inspection on September 2, 1987. Copies of the inspection forms are enclosed. The U.S. EPA will contact you regarding any deficiencies noted on the forms.

If you have any questions, please contact me at (614) 481-2055.

Sincerely,

William M. Schneider
Division of Solid & Hazardous Waste Management
Central District Office

WMS/sc

Enclosures

cc: Mike Savage, DSHWM, CO

16 JAN 1987

Columbus Coated Fabrics
OHD 004 294 351

George Hamper, Chief
Ohio Technical Unit

Jim Brossman, Chief
Ohio-Minnesota Enforcement Unit

This is in response to your request for assistance on a corrective action problem that exists at Columbus Coated Fabrics facility located in Columbus, Ohio. Columbus Coated Fabrics is a RCRA permitted facility and therefore is not eligible for a corrective action order under the 3008(h) authority. The request was made to investigate the possibility of pursuing a permit modification at the facility which would implement a schedule for corrective action. There are a number of problems with this approach.

Our authority is not clear for pursuing corrective action on facilities which were issued permits prior to November 8, 1984. Under 3005, section 212 of HSWA, it states that "Review of any application for a permit renewal shall consider improvements in the state of control and measurement technology as well as changes in applicable regulations." This implies that our authority to require corrective action at permitted facilities would be at the time of permit renewal. Columbus Coated Fabrics permit will not be up for renewal until 1994.

If we were to pursue a permit modification at this site, the facility would need to be in complete agreement with the corrective action schedule we establish, because our authority to impose this may not stand up in an Administrative Hearing.

Also, the facility would need to address all existing solid waste management units on site that have had a release at this time. Columbus Coated Fabrics has only investigated the release coming from a tank farm which stores product and not waste. The fact that the release occurred from a product storage unit could also present a problem. The final RCRA Facility Assessment Guidance effective October 9, 1986, provides guidance on when an area associated with a production process can be considered a solid waste management unit subject to corrective action. The policy directive states that "Several Regions have requested clarification regarding the application of the concept of 'solid waste management unit' to other contaminated areas at facilities, such as one-time spills, leakage from product storage, and releases from production areas that are not routine, systematic and deliberate. Such releases are not considered to be solid waste management units." Considering this policy directive, we have questionable authority in this instance unless the area managed waste at one time.

A permit modification would also be open to public participation and during a conversation with Walter Nied of the Ohio-MN Enforcement Unit, it was derived that Columbus Coated Fabrics would be reluctant to have public participation initiated on the corrective action.

Through a phone conversation with Bill Schnieder of the Ohio Environmental Protection Agency (OEPA), it was stated that the OEPA has the authority under Section 6116 of the Clean Water Act, and OAC-3734 of the Resource Conservation and Recovery Act, to pursue this clean-up action. The best option may be to allow the State to proceed under their authority, and if the State is having difficulty in achieving an appropriate resolution to the corrective action problem, then we would be willing to work on a permit modification.

If you have any further questions, please do not hesitate to contact Ms. Rebecca Strom of my staff, at (312) 886-6194.

5HS-JCK-13:R.Strom:GGW:Disk #11:1-14-87:

	TYP.	AUTH.	IL CHIEF	IN. CHIEF	MI. CHIEF	MN/WI CHIEF	OH. CHIEF	TFS CHIEF	SWB CHIEF	WMD DIR
INIT. DATE	LLW	1/15/87					1/16/87			

U.S. EPA REGION V
RCRA ENFORCEMENT SETTLEMENT CONFERENCE

MEETING ROSTER

SUBJECT COLUMBUS COATED FABRICS INTERIM ACTIVITIES AND
 DATE 9-18-86 POSSIBLE 3008(W) ORDER.
 PLACE COLUMBUS, OHIO - C.C.F. PLANT. MEETING ROOM

PERSON	REPRESENTING	ADDRESS	TELEPHONE
WALTER NIED	U.S. EPA		
LINNEA SAUKKO	O. EPA - GEOLOGIST	C.D.O. - COLUMBUS	614-462-8188
BILL SCHNEIDER	O. EPA - HAZ. WASTE	" "	466-8934
* RICK SPRINGER	BORDEN CHEM (C.C.F.)	165 N. WASHINGTON AVE COLUMBUS 43215	614-225-4298
BILL ILG	" "		297-6043
JIM WEAVER	" "		297-6127
DAVE DEPROSPERO	" "		297-6106
* PRINCIPAL FACILITY CONTACT			

SETTLEMENT CONFERENCE

NAME WALTER NIED
DATE 9-18-86
SUBJECT COLUMBUS COATED FABRIC - LEAKING U.G. TANKS

SUMMARY OF CONFERENCE

10:00a INSPECTED U.S. TANK AREA PARTICULARLY THE 3 SUMPS AND 4 MONITORING WELLS INSTALLED TO EVALUATE AND REMEDIATE THE KNOWN RELEASE OF MEK & MEKX.

11:00 PRESENTATION BY T.W. GATES - BORDEN'S HYDROGEOLOGIST - CONSULTANT
HE SUMMARIZED 1) HYDROGEOLOGICAL DATA 2) WELL & SUMP CONSTRUCTION DETAILS 3) INVENTORY OF ALL EXISTING WELLS WITHIN 2 MILES (234). 4) SAMPLE ANALYSES (NOTE - HARD COPY NOT AVAILABLE FROM LAB YET. 5) CROSS SECTIONS DEVELOPED FROM EXISTING WELL LOGS. NOTE - VERBALLY MR. GATE WAS TOLD BY LAB THAT NO SOLVENT CONS. ABOVE LOW PPB IN GRD. H₂O SAMPLES. 7100PPM CONC OF SOLVENTS IN SUMP SAMPLES. HE WILL SUBMIT A REPORT SUMMARIZING ALL ANALYTICAL DATA AS SOON AS HE RECEIVES THE LAB REPORTS AND SUBMIT A SAMPLING FREQUENCY. WE THEN DISCUSSED THEIR REVISED INTERIM ACTIVITIES PLAN.

1:00p-2:00 THE REMAINDER OF THE MEETING WAS SPENT DISCUSSING C.C.F. WILLINGNESS TO ENTER INTO NEGOTIATIONS ON A 3-PARTY CORRECTIVE ACTION ORDER. MR. SPANGLER CLEARLY STATED THAT THEY BELIEVE A CONSIST ORDER WOULD BE TO THEIR ADVANTAGE BUT QUESTIONED WHETHER 3008(L) JURISDICTION APPLYS TO THIS SITUATION - THEY ARE NOT AN INTERIM STATUS FACILITY - PART B ISSUED FOR 501 - DRUM STORAGE. NOTE - I WILL REQUEST THAT H.Q.B. EVALUATE THIS

CONVERSATION RECORD

TIME
10:30

DATE
12/16/86

TYPE

☐ VISIT

☐ CONFERENCE

☒ TELEPHONE

☐ INCOMING

☒ OUTGOING

ROUTING

NAME/SYMBOL	INT

Location of Visit/Conference:

NAME OF PERSON(S) CONTACTED OR IN CONTACT
WITH YOU

Jaclyn Thiell

ORGANIZATION (Office, dept., bureau,
etc.)

OWPE

TELEPHONE NO:

FTS 475-
8727

SUBJECT

3008(h) Corrective Action Order in the matter of
Columbus Coated Fabrics

SUMMARY

Ms. Thiell related that a 3008(h) Corrective Action Order would be inappropriate to enter into with a facility that did not have interim status (has a permit for storage). Ms. Thiell had conferred with Jenny Steiner, attorney/tech person and section chief in the RCRA Guidance and Evaluation Section who remarked that Congress clearly intended to address only interim status facilities and that we had no authority to enter into the order. We could expect many problems down the line if in fact there were problems and they challenged us and the argument would be made that we did not have the authority to have entered into the Order, ^{in the first place.} Ms. Thiell suggested that we go the permit modification route and talk to the permit people as quickly as possible. She also gave me the number of Jenny Steiner FTS 475-9329 or Susan O'Keefe (same no.) if I had further questions.

ACTION REQUIRED

Speak to tech person and permit people

NAME OF PERSON DOCUMENTING CONVERSATION

Anne L. Alonzo

SIGNATURE

Anne L. Alonzo

DATE

12/16/86

ACTION TAKEN

SIGNATURE

TITLE

DATE

9-18-86

C.C.F. 10:00 a

COLUMBUS OR.

SIGN IN SHEET

WALTER K NIED

TODD M GATES

LINNEA SAUKKO

Bill Schmidt

RICK SPRINGER

BILL ILG

Jim Weaver

Dave DeProspero

(312) 886-0992

513-248-1025

614-462-8188

466-8934

614-225-4298

614-297-6043

614-297-6127

614-297-6106

U.S. EPA

TMG, INC.

OEPA

OEPA-DSALM

BORDON

BORDON-CCF

Borden CCF

Borden CCF

1) 2 Photos - Supp & M.W.'s
Approved by Borden - Polaroids

CONTACT



State Of Ohio Environmental Protection Agency

P.O. Box 1049, 361 East Broad St., Columbus, Ohio 43216-1049
(614) 466-8565



Richard F. Celeste, Governor

August 18, 1986

RE: COLUMBUS COATED FABRICS
FRANKLIN COUNTY
OHD004294351

Mr. Jim Brossman (5HE-12)
Minn./Ohio RCRA Enforcement Unit
RCRA Enforcement Section
U.S. EPA, Region V
230 South Dearborn Street
Chicago, Illinois 60604

RECEIVED

AUG 20 1986

U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT BRANCH

Dear Mr. Brossman:

Per our telephone conversation on August 8, 1986, I have enclosed a copy of my file to date regarding the solvent contamination at the Columbus Coated Fabrics (CCF) facility and the response actions of CCF and Borden, Inc. The work plan for the preliminary response activities performed by T.M. Gates also ar enclosed.

As you mentioned, U.S. EPA and Ohio EPA will delay entering into a RI/FS Consent Agreement with CCF and Borden, Inc. until after the preliminary results are reviewed. It is estimated that Ohio EPA may receive the preliminary report by late September. Depending on the results, it is envisioned Ohio EPA and U.S. EPA will then meet with CCF and Borden, Inc. to prepare a Consent Agreement and begin a RI/FS project.

If you have any questions please call me at (614) 466-8934.

Sincerely,

William M. Schneider
Division of Solid & Hazardous Waste Management
Central District Office

WMS/sc

Enclosure

cc: Ed Kitchen, DSHWM, CO
Wes Drake, ER
Jenny Tiell, Legal

0108T/35



inter-office communication

TO: Ed Kitchen, S&E Section, DSHWM date: August 11, 1986
from: Bill Schneider through Steve Rath, Unit Supervisor, DSHWM, CDO
subject: Columbus Coated Fabrics, Franklin County, Underground Tank Leak, RI/FS

Thank you for calling U.S. EPA. I spoke with Jim Brossman (phone memo) on Friday (8-8-86). U.S. EPA wishes to be involved and will likely prepare a Three-Party Consent Agreement similar to Hilton-Davis.

Enclosed are my files which will bring you up to date on the project status. Also, I suggest contacting Jenny Tiell and setting up a meeting between the three (or more) of us to discuss this issue and Ohio EPA responsibilities for the Three-Party Consent Agreement.

If you have any questions, let me know (6-8934).

Thanks.

BS/sc

Enclosures

cc: Jenny Tiell, Legal
Wes Drake, ER

0108T/31

RECEIVED
OHIO EPA

AUG 12 1986

DIV. of SOLID & HAZ WASTE MGT.

COLUMBUS COATED FABRICS

Division of
BORDEN CHEMICAL, BORDEN INC.



July 18, 1986

OEPA
Mr. Wes Drake
Chief, Emergency Response Section
361 East Broad Street
P. O. Box 1049
Columbus, Ohio 43216

Dear Mr. Drake:

Based upon initial assessment of an underground storage area, Columbus Coated Fabrics herein notifies regulatory agencies of our findings.

Please refer to the attached outline describing background to our findings, action taken and planned activities.

Please contact our office should there be any questions or comments. I can be reached at 614/297-6127.

Sincerely,

James C. Weaver
Director of Manufacturing
COLUMBUS COATED FABRICS
Division of Borden Chemical, Borden, Inc.

JCW/nj
enc.

COLUMBUS COATED FABRICS

Division of
BORDEN CHEMICAL, BORDEN INC.



July 18, 1986

Sequence of Events

- A. CCF planned a spill containment wall for storage tanks.
- B. During construction of the south containment wall, a saturated gravel fill material associated with an underground tank area was encountered. Waters within the saturated fill were observed to contain a solvent odor and the fluid separated into both organic and aqueous phases.
- C. CCF discontinued trench operations and contacted their Corporate Environmental Group and outside consultant. (T. M. Gates, Inc.)

Activities Taken To Date

- A. Material Control
 - 1. Constructed shallow sump in trench.
 - 2. Collected liquid from within saturated fill.
 - 3. Transferred organic and aqueous phases into empty tanks.
- B. Tank Assessment
 - 1. Scheduled petrotite tank testing.
 - 2. Monitored tank levels.
 - 3. Collected liquid samples from tanks for analysis.
 - 4. Consolidated tank contents to minimize number of active tanks.
 - 5. Maintained empty tanks as assigned.
 - 6. Checked and corrected pump seals, valves and/or pipes found to be faulty.
- C. Evaluate Soil Data
 - 1. Reviewed construction plans.
 - 2. Reviewed foundation borings and well log.
 - 3. Constructed trench sump.
 - 4. Dug test pits and holes.
 - 5. Logged shallow soil profile.
 - 6. Collected soil and aqueous samples for analysis.

Page 2

Activities Planned

A. Material Control

1. Continue product recovery.
2. Plan and construct additional recovery points as directed by consultant.
3. Evaluate aqueous treatment options.

B. Tank Assessment

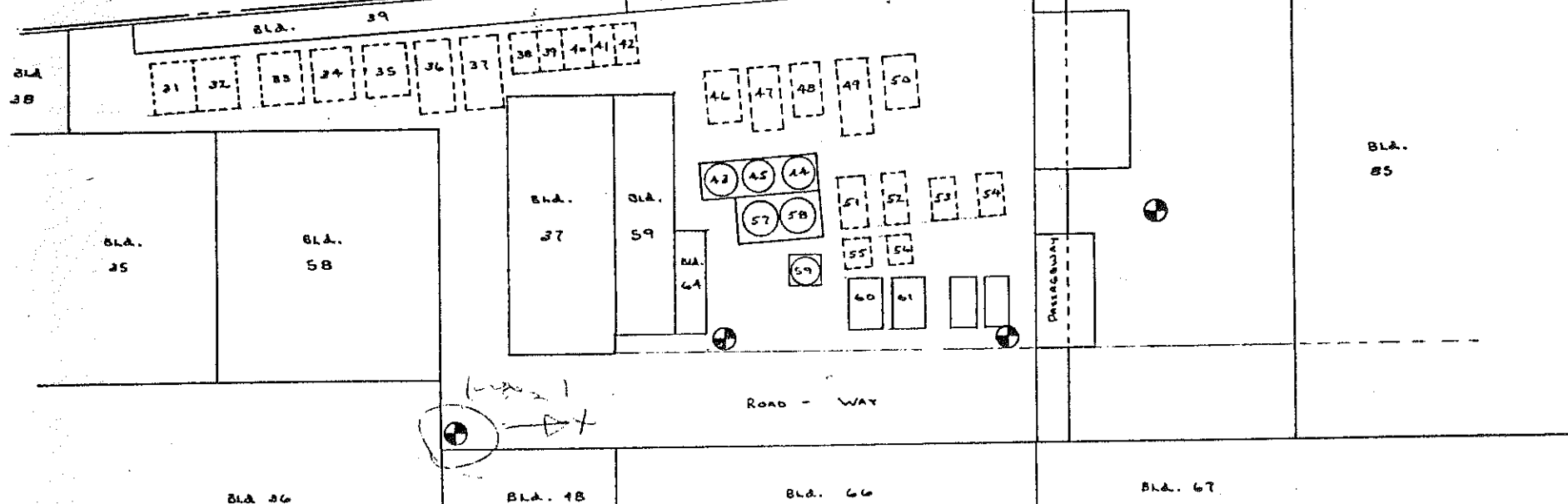
1. Conduct systematic testing of all active tanks. (Petrotite)

C. Remediation

1. Prepare report on initial assessment.
2. Prepare remedial investigation plan.
 - health and safety
 - environmental
 - hydrogeologic
3. Prepare plans and recommendations for enhanced material recovery and/or contaminated waters.
4. Implement Remedial Investigation
 - Investigation findings
 - Conclusions and recommendations
5. Implement remedial program.
6. Facility assessment of underground tanks and future operations.



RAIL ROAD RIGHT OF WAY



COLUMBUS COATED FABRICS
COLUMBUS, OHIO

Figure 1 SOIL BORE/MONITORING WELL
LOCATIONS

I. Number 7-25-9529Time & Date Reported 1445 7/18/86 Discovered PM 7/14/86 Occurred unknownReported by (Name & Position) Jim Wanner - Dept Mfg. - Borders Co's Coated FabricTelephone (114) 297-6127 Did Spiller Report? Company yes no Complaint yes noSuspected Spiller Borders, Columbus Coated Fabric Div.Mailing Address 1200 N. Grant St., Col's OH 43216-0208Product Spilled MEK - phthalate plasticizers one suspect Type: CApproximate Amount (Duration) unknown Size: U Priority: IISource of Spill suspected HST Areas Affected: A L S G NoneWaterway Affected G.W. Weather clearLocation (County & City) Franklin Co - Columbus(Street Location) @ Tank Farm @ 1200 N. GrantDid You Tell Spiller To Call The N.R.C.? yes no (1-800-424-8802, Washington D.C.)

COMMENTS AND FOLLOW-UP INFORMATION

Company found odors in soil & waters, when digging system for above ground Tank Farm Tank

MEK - 80% ish floating

MIBK Plasticizers - phthalates

Trace Toluene

Trace Toluene

Trace Toluene

Called J.M. Gates & Co - rep. Tom Jauron (313) 772-1412

as consulting Eng / Geo-hydrologist - 1 press 5 2/10/86

7/22 1000 to 1012 to

22 or 23 Tanks Total

4 2k Tanks MEK + 2 - 10K^s + 2 10K^s + 2 10K^s

2 + 1 - MIBK

TELEPHONE RECORD

District Office C.D. Talked to Wadell Time & Date 1445 7/18/86Water Supply 98307) Retno T.E. Testing FFloyds Brown Talked to Wadell Time & Date 1445 7/18/86District Engineer Retno T.E. Testing FFloyds Brown Talked to Wadell Time & Date 1445 7/18/86ODNR (night: 265-7006) Talked to Wadell Time & Date 1445 7/18/86DSHWM Lundy Adelsberger Talked to Wadell Time & Date 1445 7/18/86ODA (866-6361) Talked to Wadell Time & Date 1445 7/18/86ODH (5190) Talked to Wadell Time & Date 1445 7/18/86PIC (8508) Al Franks 263-0220: Home Talked to Wadell Time & Date 1445 7/18/86SFM (864-5510) Talked to Wadell Time & Date 1445 7/18/86FD or PD Dan Pexton - 222-7641 Talked to Wadell Time & Date 1445 7/18/86Talked to Wadell Time & Date 1445 7/18/86Talked to Wadell Time & Date 1445 7/18/86Talked to Wadell Time & Date 1445 7/18/86Talked to Wadell Time & Date 1445 7/18/86Talked to Wadell Time & Date 1445 7/18/86Talked to Wadell Time & Date 1445 7/18/86Follow-up Calceoproses - 6 test holes Received by WadellBusiness yes no TSS yes noDistrict yes no

GREGORY S. LASHUTKA
CITY ATTORNEY
CURTIS F. GANTZ
FIRST ASSISTANT CITY ATTORNEY
DONALD R. KELLER
CHIEF LABOR LAW ATTORNEY
PATRICK M. McGRATH
CHIEF COUNSEL
DONALD PLANK
CHIEF REAL ESTATE ATTORNEY
RONALD J. O'BRIEN
CHIEF PROSECUTOR
DEBORAH D. PRYCE
FIRST ASSISTANT PROSECUTOR
SCOT E. DEWHIRST
DIRECTOR
INTAKE/NIGHT PROSECUTOR PROGRAM
D. EDGAR BARKELOO
DAVID F. BECK
ROBERT A. BELL
DAVID M. BUCHMAN
JAMES J. FAIS
H. WILLIAM POLLITT, JR.
SENIOR ASSISTANT CITY ATTORNEYS



CITY OF COLUMBUS

DEPARTMENT OF LAW

CIVIL DIVISION

90 West Broad Street
Columbus, Ohio 43215
614/222-7385

May 10, 1985

DANIEL W. DRAKE
DEBORAH EVERSON
MELINDA J. FRANK
LAWRENCE A. GARLINGER
BARBARA A. GATES
EILEEN A. GROVES
DEBORAH F. HOFFMAN
DAVID W. INSLEY
JOHN C. KLEIN
ROBERT B. LEVERING
JOYCE B. LINK
MICHAEL C. MATUSKA
MARCEE C. McCREARY
STEPHEN L. McINTOSH
LAWRENCE G. MUSCARELLA
C. EILEEN PRUETT
GUY L. REECE II
MARVIN E. ROTHHAAR
LISA L. SADLER
MARCUS S. SHORE
W. JAMES SIKKA
JEFFREY M. SMITH
LAURA R. STITT
DAVID E. TINGLEY
JAMES D. VIETS
ASSISTANT CITY ATTORNEYS

Roger Grimes, Esq.
Assistant Regional Counsel
U.S. EPA - Region V
230 South Dearborn Street
Chicago, Illinois 60604

Re: Columbus Coated Fabrics
Columbus, Ohio - OHD 004-294-341

Dear Mr. Grimes:

The City of Columbus wishes to respond to Mr. W. Bailey Barton's letter of April 11, 1985, and to notify the U.S.E.P.A. of the developments in regard to the above-captioned permit.

In Mr. Barton's letter, he indicated that CCF was never notified of Columbus Fire's lack of knowledge or familiarization with the hazardous materials and facilities at the plant. However, Mr. Barton was informed of Columbus Fire's position prior to and at the Public Hearing of July 25, 1984. Additionally, there were subsequent conversations with CCF and Columbus Health regarding the need for familiarization. (See attached letter dated September 6, 1984.) CCF, at that time, refused to enter into the Memorandum.

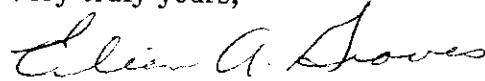
Correctly, Mr. Barton points out that only Grant Hospital was contacted by Ms. Ardiente inquiring as to the CCF contingency plan. However, at a March 21, 1985, meeting between the City and CCF, a representative of University Hospital was also present and they also did not have the 1982 plan. It was at that meeting that Mr. Barton indicated that revised copies of contingency plan would be sent to the seven addressees.

As a result of the discussion of March 21, 1985, the Columbus Health Department and CCF have entered into the attached Memorandum of Understanding. As part of that understanding, CCF is to arrange familiarization/informational programs for the local fire houses and police substations on all shifts. It is my understanding that these plans have not been finalized as of this time, but the proposed familiarization is scheduled for the first week in July. The Raw Materials Safety Data Sheets promised at the March 21, 1985, meeting have not yet been received by Columbus Fire.

Roger Grimes, Esq.
May 10, 1985
Page 2

The City of Columbus, Board of Health and Public Safety respectfully request that the attached Memorandum of Understanding with CCF be attached as part of, and a condition of, any permit issued to CCF. When the proposed familiarizations, required by 40 CFR § 264.37, have been completed and the Safety Data Sheets supplied, the City will notify the U.S.E.P.A. of the satisfaction of our objections. To insure the continuing compliance with 40 CFR § 264.37, we would repeat our request that the Memorandum be incorporated with any permit.

Very truly yours,



Eileen A. Groves
Assistant City Attorney

EAG:klm

cc: Ms. Paulette Wolfson, Judicial Officer
W. Bailey Barton, Borden Inc.
Chief Woltz, Columbus Fire
William Myers, Columbus Health

0216m



City of Columbus
Mayor Dana G. Rinehart

Public Safety Department Fire Division

Don E. Werner, Jr.
Fire Chief

RECEIVED
MAY 1 1985
WASTE MANAGEMENT
DIVISION

March 12, 1985

Edith M. Ardiente, P.E.
Chief, Technical Programs Section
United States Environmental Protection Agency
Region 5
230 South Dearborn Street
Chicago, Illinois 60604

Re: Receipt of Contingency Plan
from Columbus Coated Fabrics
1280 North Grant Avenue
Columbus, Ohio

Dear Ms. Ardiente:

In your letter of January 18, 1985, you were interested in determining the approximate date on which the Division of Fire received a copy of Columbus Coated Fabrics' Hazardous Waste Contingency Plan, and when we received copies of revisions to the plan.

The answer to that inquiry is simple. The Division of Fire never received a copy of Columbus Coated Fabrics' Hazardous Waste Contingency Plan or any updates thereto. The first time we saw this plan was when we discovered it at the Columbus Public Library while reviewing Columbus Coated Fabrics' application prior to the July 25, 1984 public hearing. We did receive what Columbus Coated Fabrics called their "Spill Prevention Control and Counter-measures Plan and the Emergency Action Plan" on June 7, 1982. We did not receive updates or revisions to this plan at any time. It is important to note that the plan we did receive from Columbus Coated Fabrics did not deal with hazardous waste but rather mostly with the liquid hazardous materials that Columbus Coated Fabrics maintains on site to use in its manufacturing process.

Furthermore, we do not feel that either the plan that was submitted to us on June 7, 1982 or the plan that was submitted by Columbus Coated Fabrics for public review prior to the July 25, 1984 public hearing complies with Section 264.37 or 264.52 of 40 CFR. Section 264.37 reads in pertinent part as follows:

Office of the Chief

200 Greenlawn Avenue
Columbus, Ohio 43223-2693
(614) 222-7533

Bureau of Fire Prevention

300 North Fourth Street
Columbus, Ohio 43215-2134
(614) 222-7641

Bureau of Training

240 Greenlawn Avenue
Columbus, Ohio 43223-2609
(614) 222-6360

Bureau of Maintenance

270 Greenlawn Avenue
Columbus, Ohio 43223-2609
(614) 222-7416

Medical Training Center

739 West Third Avenue
Columbus, Ohio 43212-3102
(614) 222-7384

264.37 Arrangements with local authorities

(a) The owner or operator must attempt to make the following arrangements, as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:

(1) Arrangements to familiarize police, fire departments, and emergency response teams with layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to and roads inside the facility, and possible evacuation routes;

(b) Where state or local authorities decline to enter into such arrangements, the owner or operator must document the refusal in the operating record.
(emphasis added)

A fair reading of this section would place an affirmative duty on Columbus Coated Fabrics to attempt to make arrangements to familiarize the Division of Fire with the listed conditions. It is our contention and position that Columbus Coated Fabrics has never attempted to make these arrangements and they have not in fact taken place. Further we feel that if Columbus Coated Fabrics wishes to contest our position then the burden is on Columbus Coated Fabrics to produce the documentation of our refusal to enter into said arrangements.

Section 264.52 reads in pertinent part as follows:

264.52 Content of contingency plan.

(c) The plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services, pursuant to Section 264.37. (emphasis added)

This section seems to make it mandatory for the contingency plan to describe these agreements. Neither the June 7, 1982 nor the plan submitted for public review contain these agreements.

You also wanted information concerning the frequency and extent of visits to Columbus Coated Fabrics by members of our Division for either familiarization or inspection purposes.

After surveying two fire stations closest to Columbus Coated Fabrics I have learned that the fire companies at those stations have not made familiarization inspections at Columbus Coated Fabrics either on their own initiative or by invitation from Columbus Coated Fabrics, for at least the past four years.

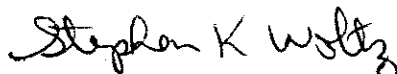
As for Fire Prevention inspections, prior to 1984 it was Division policy to inspect Columbus Coated Fabrics four times a year. In 1984 because of manpower shortages we now inspect all buildings only one time per year. After reviewing the records, I find that our inspection frequency fairly well adhered to our policy. However, I think it is important to distinguish between the type of inspection we made and the type required under 40 CFR. In the past we inspected only for violations of our Fire Prevention Code. We did not make inspection to gain knowledge about the hazardous waste process at Columbus Coated Fabrics nor were we invited to do so.

In addition our records indicate that from 1982 until the present the Division of Fire has responded to actual fires at Columbus Coated Fabrics on:

March 30, 1982
September 23, 1982
March 16, 1984
May 2, 1984
November 1, 1984
November 17, 1984
November 29, 1984

If you need any further information from the Division of Fire please contact me at (614)222-7641.

Very truly yours,



Stephen K. Woltz,
Battalion Chief
Fire Prevention Bureau

SKW/jlw



GRANT HOSPITAL

RECEIVED
MAR 5 1985

WASTE MANAGEMENT
BRANCH

March 1, 1985

U.S. Environmental Protection Agency
Solid Waste Division
Attn: Mr. Charles Slaustas
230 South Dearborn Avenue
Chicago, Illinois 60604

Dear Mr. Slaustas:

In response to your inquiry concerning our involvement with a contingency plan from the Columbus Coated Fabrics Company, I have been unable to locate any correspondence or plan they may have sent to us.

Grant Medical Center would be willing to assist with any type of contingency plan that would better our response to any incidents that may occur.

If you have any questions or need further assistance in this matter, please contact me at 614/461-3671.

Sincerely,

Brian Saul
Fire/Safety Coordinator
Grant Medical Center

BS/bap

cc: Gary Brown,
Columbus Health Dept.



City of Columbus
Mayor Dana G. Rinehart

Dan Khruck

Public Safety Department Police Division

Dwight Joseph, Chief of Police

120 W. Gay Street
P.O. Box 15009
Columbus, Ohio 43215-0009
(614) 222-4545

January 29, 1985

Edith M. Ardiente, P.E.
United States Environmental Protection Agency
Region 5
230 South Dearborn St.
Chicago, Illinois 60604

Ms. Ardiente:

In response to your request dated January 18, 1985, the Columbus Division of Police did receive a contingency plan relating to spills from Columbus Coated Fabrics, 1280 N. Grant, Columbus, Ohio, in June, 1982. According to our records, the plan has not been updated.

The Division does not conduct inspections (Fire Department's responsibility) of locations such as Columbus Coated Fabrics, but each officer assigned to a district is required to familiarize himself with his individual area of responsibility.

If the Columbus Division of Police may be of further assistance, please do not hesitate to contact me at 1-614-222-4606.

Sincerely,

J. D. Evans

Sergeant J. D. Evans
Research and Development Section
Columbus Division of Police

/sp



RECEIVED
FEB 04 1985
WASTE MANAGEMENT
BRANCH

JAN 1 9 1985

64 D 004 294 351

Police Chief
City of Columbus
120 West 6th Street
Columbus, Ohio 43215

RE: Receipt of Contingency Plan
from Columbus Coated Fabrics
1200 North Grant Avenue
Columbus, Ohio

Dear Sir:

The purpose of this letter is to request clarification regarding the extent of coordination between your organization and Columbus Coated Fabrics for their hazardous waste storage facility located at the above-referenced address. Specifically we are interested in determining the approximate date on which your organization received a copy of Columbus Coated Fabric's contingency plan, as well the date or dates when copies of revisions to the plan were received. Also, please provide information to this office concerning the frequency and extent of visits to Columbus Coated Fabrics by representatives of your organization for either familiarization or inspection purposes.

The above information is needed in order to process the petition for review of the final permit decision for this facility. This petition was filed by the Columbus Health Department on November 2, 1984.

If you have any questions regarding this request for information or desire additional information please contact Charles Stastas of my staff using either this region's toll-free number (800) 621-2431 or his direct number: (312) 896-6190.

Sincerely,

Edith M. Ardente, P.E.
Chief, Technical Programs Section

cc: Eileen A. Graves
Assistant City Attorney
City of Columbus

William G. III
Columbus Coated Fabrics

bcc: Roger Grimes, ORC

INITIALS	DATE	TIPIST <i>J. Turner</i> 1/10/85	AUTHOR <i>OK</i> 1/10/85	STU #1 CHIEF	STU #2 CHIEF <i>DJB</i> 4/1/85	STU #3 CHIEF	TPS CHIEF <i>Am</i> 1-22	WMB CHIEF	WMD DIRECTOR
----------	------	---------------------------------------	--------------------------------	-----------------	---	-----------------	-----------------------------------	--------------	-----------------



City of Columbus
Mayor Dana G. Rinehart

Columbus Health Department

William C. Myers, M.S., Health Commissioner

The Ollie M. Goodloe Health Center
181 Washington Boulevard
Columbus, Ohio 43215-4096

September 6, 1984

W. Bailey Barton
Director, Environmental Affairs
Borden, Inc.
165 N. Washington Avenue
Columbus, Ohio 43215

Dear Mr. Barton:

As per our conversation I am enclosing a draft of the Memorandum of Understanding which delineates the items mentioned at our last meeting. All of the items in this draft, except number seven (7), were previously discussed. We still desire to cooperate with you in attaining a signed Memorandum of Understanding between the Columbus Coated Fabrics and the Columbus Health Department.

As you stated you will contact us next week after you review the draft to arrange a meeting to discuss this issue further.

Thank you for your cooperation in this matter.

Sincerely,

Michael J. Pompili
Assistant Health Commissioner
Environmental Health Division

MJP:clh

cc: Carl A. Rivasi, Columbus Coated Fabrics
William C. Myers, Health Commissioner

Enclosures



Board of Health

Mayor Dana G. Rinehart
President Ex-Officio
Marvin G. Green, M.D., President Pro Tempore
William C. Myers, M.S., Secretary

Joseph S. Backiewicz, D.D.S.
Nancy A. Brunner, R.N., M.S.
George L. Eckert, Jr., D.O.
Jack W. Miles, M.D.

MEMORANDUM OF UNDERSTANDING
BETWEEN COLUMBUS COATED FABRICS (CCF),
CITY OF COLUMBUS AND COLUMBUS BOARD OF HEALTH

The parties to this agreement, Columbus Coated Fabrics (CCF), City of Columbus and Columbus Board of Health, after extensive conversations and negotiations, seek to outline in this agreement the understanding and obligations reached by the parties. The terms and conditions of the agreement are not to be construed as to replace or supercede any statutory obligations of Columbus Coated Fabrics under the U.S.E.P.A. or Ohio E.P.A. regulations. These agreements are supplemental thereto. Any conflict or inconsistency with statutory requirements are to be construed in favor of the statutes. These terms and conditions shall continue to be effective with successive parties in interest.

- 1) Columbus Coated Fabrics agrees to transmit to the Columbus Sewers and Drains Division a chemical analysis of their hazardous waste at least once per calendar year.
Columbus Coated Fabrics agrees to notify the Columbus Sewers and Drains Division and submit a hazardous waste analysis if CCF alters present processing procedures that will alter the composition of their hazardous waste.
- 2) Columbus Coated Fabrics agrees to notify the Columbus Fire Department as soon as possible in the event of an incident which pursuant to state or federal law or regulations require CCF to give formal notice to the Ohio Environmental Protection Agency. Furthermore CCF also agrees to notify the Columbus Fire Department if there is a spill of a flammable hazardous waste of over twenty-five (25) gallons or more.
- 3) Columbus Coated Fabrics agrees to submit to an inspection by either the U.S. EPA, the Ohio Environmental Protection Agency or the Columbus Fire Department on a quarterly basis, with the results of the inspection being sent to the Columbus Fire Department.

Areas to be covered during the inspection shall minimally include but not limited to:

- 1) Condition of hazardous waste container;
- 2) Labeling of hazardous waste containers;
- 3) Proper storage of hazardous waste containers; and
- 4) Segregation of hazardous waste containers.

Columbus Coated Fabrics agrees to cooperate with the Columbus Division of Water in performing a cross-connection survey of the CCF facilities and then correcting any cross-connection deficiencies that are identified.

- 5) Columbus Coated Fabrics agrees to seal the existing sewer manhole that is located near the proposed hazardous waste building on their property, so that in the event of an incident, the possible containment will not escape into the city of Columbus sewer system.

Handwritten:
Reviewed
by
[Signature]
Date

- 6) Columbus Coated Fabrics agrees that no incompatible wastes will be stored at the facilities.
- 7) Columbus Coated Fabrics agrees to cooperate with the Columbus Fire Department in the arranging of practice exercises in responding to a hazardous waste emergency if it is deemed appropriate.
- 8) In the event of an incident which pursuant to State or Federal law or regulations requires formal notice to the Ohio Environmental Protection Agency CCF shall also give notice to the City of Columbus Fire Department. CCF agrees to pay the actual cost, not to exceed \$500, of a preliminary assessment of the nature and magnitude of the incident by the Columbus Health Department, provided that this agreement shall not constitute any admission or acceptance by CCF of any liability or responsibility with respect to the incident. If the Columbus Health Department proposes to conduct any evacuation or further health assessment survey and desires that any part or all of the cost be paid by CCF, a written notice and budget of the proposed action shall be submitted to CCF. Within a reasonable period, not to exceed seven days, following the submission of any such notice CCF will advise the Columbus Health Department as to whether it will agree to pay any part or all of the cost. If CCF volunteers to pay any part or all of the cost, payment shall not constitute any admission or acceptance by CCF of any liability or responsibility with respect to the incident. Neither shall such payment constitute a waiver or release of any legal claim which any person or entity may have against CCF.
- 9) Columbus Coated Fabrics agrees to make arrangements with the Columbus Police, Fire and Emergency response on their layout, facilities handled and associated hazards as required by Part 264.37 of the Resource Conservation Recovery Act.
- 10) Columbus Coated Fabrics agrees to provide a written description of the type of training and amount of training for their contingency plan as required by Part 264.16(d) of the Resource Conservation Recovery Act.

This is agreed upon between the following parties:

by _____
Representative
Columbus Coated Fabrics

by _____
William C. Myers, Health Commissioner
Columbus Health Department

MEMORANDUM OF UNDERSTANDING

BETWEEN COLUMBUS COATED FABRICS

CITY OF COLUMBUS AND COLUMBUS BOARD OF HEALTH

The parties to this agreement, Columbus Coated Fabrics, City of Columbus and Columbus Board of Health, after extensive conversations and negotiations, seek to outline in this agreement the understanding and obligations reached by the parties. The terms and conditions of the agreement are not to be construed as to replace or supercede any statutory obligations of Columbus Coated Fabrics under the USEPA or Ohio EPA regulations. These agreements are supplemental thereto. Any conflict or inconsistency with statutory requirements are to be construed in favor of the statutes. These terms and conditions shall continue to be effective with successive parties in interest.

1. Columbus Coated Fabrics having already submitted a waste analysis to the Department of Sewerage & Drains, agrees to transmit to the Columbus Health Department a hazardous waste analysis if CCF changes existing waste streams or creates new waste streams.
2. Columbus Coated Fabrics agrees to notify the Columbus Division of Fire immediately in the event of an incident which pursuant to state or federal law or regulations requires CCF to give formal notice to the Ohio Environmental Protection Agency.
3. Columbus Coated Fabrics agrees to make familiarization/informational arrangements with local authorities as required in Section 264-37 of 40CFR.
4. Columbus Coated Fabrics agrees to cooperate with the Columbus Division of Fire in the arrangement of familiarization exercises relative to emergencies associated with the hazardous waste storage area.
5. In the event of an incident, which pursuant to State or Federal law or regulations requires Columbus Coated Fabrics to notify the Ohio Environmental Protection Agency and the Columbus Division of Fire, the Columbus Health Department will perform an assessment of the nature and magnitude of the incident or take other appropriate measures to protect public health and safety. The Columbus Health Department will confer with Columbus Coated Fabrics regarding payment for such assessment or other appropriate action. However, it is understood that the Columbus Health Department will take whatever steps necessary to recover the costs for such assessment or other appropriate actions if deemed appropriate.

This is agreed upon between the following parties:

by

Carl A. Reeves 4-17-85
Representative

Columbus Coated Fabrics

by

William C. Ryan 4/22/85
Representative

Columbus Health Department

(3) Checking on operating equipment.

PART B
APPLICATION

(4) Checking on security equipment.

(ii) Remedial Action

If inspections reveal that non-emergency maintenance is needed, they will be completed as soon as possible to preclude further damage and reduce the need for emergency repairs. If a hazard is imminent or has already occurred during the course of an inspection or any time between inspections, remedial action will be taken immediately.

Columbus Coated Fabrics personnel will notify the appropriate authorities per the Contingency Plan and initiate remedial actions. In the event of an emergency involving the release of hazardous constituents to the environment, efforts will be directed towards containing the hazard, removing it, and subsequently decontaminating the affected area. Refer to the Contingency Plan for further details.

836 Park St.
Columbus OH 43215
July 27, 1984

Mr. Michael Ohm
U.S. EPA Region V
Waste Management Branch
230 S. Dearborn St.
Chicago IL 60604

Dear Mr. Ohm:

SUBJECT: COLUMBUS COATED FABRICS HAZARDOUS WASTE STORAGE FACILITY AT
1280 N GRANT

Before Columbus Coated Fabrics should be granted any Resource Conservation and Recovery Act permit, they should be required to correct plant deficiencies mentioned in Michael Pompili's statement at the July 26 hearing. The permit application should describe employee emergency training plans and also plans for briefing local public safety and medical professionals. Nearby property owners and residents should receive notification that accidents at the facility could cause them to be evacuated.

Few people are aware of the risks posed by hazardous wastes in our environment. However, I am convinced that if people had known about it, there would have been more attending the July 26 hearing. How was the hearing publicized? I'm a well-informed Columbus citizen, yet I was not aware of the hearing until after the fact. Was it held in the evening, when working people could attend? If not, it was not much of a public hearing.

I would appreciate receiving more information on the facility and on the plans for requiring it to follow more stringent regulations.

Please add my name and address to your public information mailing list so that I will receive notices of future hearings involving Central Ohio issues. Thank you for your consideration of these comments and for any information you can send regarding the issues I've mentioned.

Sincerely,

Barbara Covert

Barbara Covert

RECEIVED
JUL 28 1984
WASTE MANAGEMENT
BRANCH

Ohio EPA

Kathy Homer

Re: Franklin County
OHD004294351
HWFAB 01-25-0145

July 13, 1982

Mr. William Ilg
Senior Project Engineer
Columbus Coated Fabrics
P.O. Box 208
Columbus, Ohio 43216

Dear Mr. Ilg:

Thank you for your written response to my letter of June 23, 1982, regarding the RCRA Interim Status Inspection conducted at Columbus Coated Fabrics. The additional information you submitted should satisfactorily resolve the deficiencies listed in the April 16, 1982 Inspection Report. This office considers the eleven deficiencies cited in that report to be satisfactorily corrected, subject to verification by a reinspection of the facility, if necessary.

Once again, thank you for the time and effort you have expended to resolve this matter. Please feel free to contact me at 466-6450.

Sincerely,



Lundy J. Edelsberger
Environmental Scientist

LJA/sc

Ohio EPA

Re: Franklin County
OHD004294351
HWFAB 01-25-0145

RECEIVED
JUN 29 1982
WASTE MANAGEMENT BRANCH
EPA, REGION V

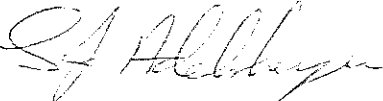
June 23, 1982

Mr. William Ilg
Senior Project Engineer
Columbus Coated Fabrics
P.O. Box 208
Columbus, Ohio 43216

Dear Mr. Ilg:

This letter is in reply to Columbus Coated Fabrics written response to the eleven deviations cited in the April 16, 1982 Inspection Report. Mr. Ilg's June 11, 1982 letter does not provide sufficient information to enable this office to determine if these deviations have been satisfactorily corrected. Please provide this office with a detailed written response, within fifteen days, to each of the cited deviations.

Sincerely,



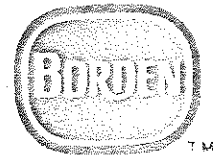
Lundy J. Edelsberger
Environmental Scientist
Hazardous Materials
Central District Office

LJA/sc

cc: Ms. Kathleen Homer, SIO, U.S. EPA, Region V
cc: Mr. Bob Fragale, Technical Permits, HWFAB, C.O.
cc: Ms. Paula Cotter, Compliance Unit, DHMM, C.O.

COLUMBUS COATED FABRICS

Division of
BORDEN CHEMICAL, BORDEN INC.



June 11, 1982

OEPA
Central District Office
Hazardous Materials Section
Attention: Lundy J. Adelsberger,
Environmental Scientist

Dear Mr. Adelsberger,

The comments/deficiencies addressed in your letter of May 11, 1982 concerning an inspection of the CCF facility, have either already been corrected or procedures have been set up and are in the process of being implemented in order to correct the noted items.

Please call if you have any questions.

Very truly yours,

William G. Ilg
Sr. Project Engineer
COLUMBUS COATED FABRICS
Division of Borden Chemical,
Borden Inc.

CENTRAL DISTRICT OFFICE

JUN 14 PM 1 31

Ohio EPA

Re: Franklin County
OHD004294351
HWFAB 01-25-0145

RECEIVED

MAY 17 1982
WASTE MANAGEMENT BRANCH
EPA REGION V

May 11, 1982

Mr. William Ilg
Senior Project Engineer
Columbus Coated Fabrics
P.O. Box 208
Columbus, Ohio 43216

Dear Mr. Ilg:

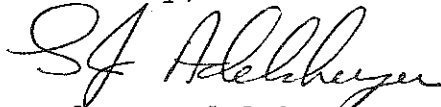
On April 16, 1982, your facility was reinspected by the Ohio Environmental Protection Agency to determine if it was in compliance with Federal/State Interim Status Hazardous Waste Regulations promulgated under the Resource Conservation and Recovery Act (RCRA, Public Law 94-580).

The enclosed inspection report is self-explanatory and contains recommendations for correcting the deficiencies found during the inspection. This office requests that you provide a written response, within thirty days, to the following deficiencies/comments contained in the enclosed inspection report:

<u>PAGE</u>	<u>QUESTION NUMBER</u>	<u>REQUIREMENT</u>
2-1	4a	DOT Shipping Name
4-2	4,4g	Inspection Plan
4-2	5	Personnel Training Program
4-4	1c	Emergency Coordinator
4-5	1,1b,1c,1d	Operating Record
4-8	1c,1e	Closure Plan

Please call (614-466-6450) if you have any questions regarding the inspection or RCRA Regulations.

Sincerely,



Lundy J. Adelsberger
Environmental Scientist
Hazardous Materials
Central District Office

LJA/sc

cc: Ms. Kathleen Homer, SIO, U.S. EPA, Region V
cc: Mr. Bob Fragale, Technical Permits, HWFAB
cc: Ms. Paula Cotter, Compliance Unit, DHM, C.O.

U.S. EPA I.D. NO. OHD004294351

U.S. EPA I.D. NO. OHD004294351

Date of Inspection: April 16, 1982 Time of Inspection: (Start) 9:30 AM (Finish) 12:30 PM
Advance Notification? No X Yes: _____
Weather Conditions: Warm and Sunny

(Name)

(Telephone)

- | | | | |
|----|--------------------|-------------------------|--------------|
| 1. | Mr. William G. Ilg | Senior Project Engineer | 614-225-6336 |
| 2. | | | |
| 3. | | | |
| 4. | | | |

RCRA INTERIM STATUS INSPECTION FORM

INSPECTOR(S)

(Name)

(Title)

(Telephone)

1.	Mr. Lundy Adelsberger	Environmental Scientist	614-466-6450
2.			
3.			
4.			

1. Type(s) of hazardous waste site activity: A. X Generation B. X Storage C. Treatment
D. Transportation E. Disposal

2. Specific hazardous wastes handled at this facility (EPA HW#):

a) Listed Wastes: See Part A of Permit

b) Non-Listed Wastes: $\frac{X}{D001}$ I $\frac{X}{D002}$ C $\frac{X}{D003}$ R $\frac{X}{D004-D017}$ E

See Part A of Permit

3. Has this facility submitted a Part A Permit Application? X Yes No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

 Yes, See Remark # X No

RCRA INTERIM STATUS INSPECTION FORM

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

_____ Yes, See Remark # _____ X No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

_____ Yes, Complete Part 3 (Transp.) X No

a) P.U.C.O. Registration Number _____

7. A brief description of site activity:

The manufacture of coated fabrics.

Site Activity:		S	T	D
Containers	I	X		
Tanks	J			
Surf. Imp.	K			
Waste Pile	L			
Land Treat.	M			
Landfill	N			
Incineration	O			
Thermal Treat.	P			
Chem/Phys/Biol	Q			
Under. Inj.	R			

REMARKS, PART 1. (GENERAL INFORMATION)

RCRA INTERIM STATUS INSPECTION FORM

PART 2. GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in compliance with the requirements of Sections 262.11 and 3745-52-11.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections 261.6 and 3745-51-06 (recycle/reuse)?	<u>X</u>	<u> </u>	<u> </u>	<u>No. 1</u>
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Sections 265.1(c)(9) and 3745-55-C-9 or via operation of an elementary neutralization unit and/or wastewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22.	<u> </u>	<u>X</u>	<u> </u>	<u>No. 2</u>
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A).	<u>X</u>	_____	_____	_____
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-52-32-B.	<u>X</u>	_____	_____	_____
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33.	<u>X</u>	_____	_____	_____
6. The generator meets the following recordkeeping and reporting requirements:				
a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B.	_____	_____	<u>X</u>	_____
b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, when applicable.	_____	_____	<u>X</u>	_____
7. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Sections 262.50 and 3745-52-50.	_____	_____	<u>X</u>	_____
8. If the generator elects to store hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under Sections 262.34 and 3745-52-34, the following requirements with respect to such storage are met:	_____	_____	<u>X</u>	_____
a) <u>Containers:</u> the waste is stored in closed containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking.	_____	_____	<u>X</u>	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) The date that accumulation began is clearly marked on each container.	_____	_____	<u>X</u>	_____
c) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	_____	_____	<u>X</u>	_____
d) Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56), and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (physical separation, signs and safety) are met.	_____	_____	<u>X</u>	_____
e) <u>Tanks:</u> the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-B and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	_____	_____	<u>X</u>	_____
f) Uncovered tanks have at least 2 feet (60 cm.) of freeboard <u>unless</u> they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	_____	_____	<u>X</u>	_____
g) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C).	_____	_____	<u>X</u>	_____
h) Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E).	_____	_____	<u>X</u>	_____
9. The generator has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Sections 262.34 and 3745-52-34).	_____	_____	<u>X</u>	_____
10. The generator keeps all of the records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records (Sections 262.34 and 3745-52-34).	_____	_____	<u>X</u>	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
11. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77) as referenced in Sections 262.34 and 3745-52-34.			<u>X</u>	

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND 3745-55-30 THRU 37 AND 3745-55-50 THRU 70 BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER PART 4 - GENERAL INTERIM STATUS REQUIREMENTS.

REMARKS, PART 2. GENERATOR REQUIREMENTS

1. The facility formulates inks from pigments and methyl ethyl ketone. The formulated inks that can not be reused to make other inks and solvent washes from the formulation process undergo distillation for recovery of MEK. The waste sludge from the recovery process fails the EP Toxicity Test for cadmium and lead. This sludge is landfilled at CECOS. Dust stop oil from the band bury operation fails the EP Toxicity Test for cadmium. This oil is removed and recycled by SYSTECH Liquid Treatment Corporation.
2. Some of the very recent hazardous waste manifests (April) did not have the word "Waste" inserted ahead of the DOT Shipping Name.

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards
C: Preparedness and Prevention
D: Contingency and Emergency

E: Manifest/Records/Reporting
F: Ground Water Monitoring
G: Closure

H: Financial Requirements

Subpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265.13(b) and 3745-55-13-B).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).				
a) 24 hour surveillance system.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
b) Artificial or natural barrier completely surrounding the active portion of the facility.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Sections 265.15 and 3745-55-15)		<u>X</u>		<u>No. 3</u>
a) Inspect emergency equipment.	<u>X</u>			
b) Inspect monitoring equipment.	<u>X</u>			
c) Inspect security, alarm and communications devices.	<u>X</u>			
d) Inspect process equipment (pipes, pumps, etc.).			<u>X</u>	
e) Inspect containment structures (dikes, curbs, etc.).			<u>X</u>	
f) Inspect facility for structural malfunctions (roof, floor, etc.).			<u>X</u>	
g) Inspect hazardous waste handling/loading areas each day used.		<u>X</u>		<u>No. 4</u>
h) Record of any malfunctions due to equipment or operator errors.			<u>X</u>	
i) Record of any hazardous waste discharges.			<u>X</u>	
5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.		<u>X</u>		<u>No. 5</u>
6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.	<u>X</u>			
7. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).	<u>X</u>			

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) Protection from sources of ignition.	<u>X</u>	___	___	___
b) Physical separation of incompatible waste materials.	<u>X</u>	___	___	___
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<u>X</u>	___	___	___
d) Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.	___	___	<u>X</u>	___

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).	___	<u>X</u>	___	___
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).	<u>X</u>	___	___	___
a) Internal alarm system	<u>X</u>	___	___	___
b) Access to telephone, radio or other device for summoning emergency assistance.	<u>X</u>	___	___	___
c) Portable fire control equipment.	<u>X</u>	___	___	___
d) Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.	<u>X</u>	___	___	___
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	<u>X</u>	___	___	___
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34).	<u>X</u>	___	___	___

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components:	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
a) Actions to be taken by personnel in the event of an emergency incident.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
b) Arrangements or agreements with local or state emergency authorities.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	<u> </u>	<u>X</u>	<u> </u>	<u>No. 6</u>
d) A list of all emergency equipment including location, physical description and outline of capabilities.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53).	<u> </u>	<u> </u>	<u> </u>	<u>No. 7</u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:	<u> </u>	<u>X</u>	<u> </u>	<u>No. 8</u>
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b)(1) and 3745-55-73-B-1).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	<u> </u>	<u>X</u>	<u> </u>	<u>No. 8</u>
c) The estimated (or actual) weight, volume or density of the waste material(s).	<u> </u>	<u>X</u>	<u> </u>	<u>No. 8</u>
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	<u> </u>	<u>X</u>	<u> </u>	<u>No. 8</u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
e) The present physical location of each hazardous waste within the facility.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
f) <u>FOR DISPOSAL FACILITIES</u> , the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b)(2) and 3745-55-73-B-2).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
g) Records of any waste analyses and trial tests required to be performed.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

NOTE: THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.

3. When applicable, the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
---	---------------	---------------	----------	---------------

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

4. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
--	---------------	---------------	----------	---------------

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
b) Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
5. Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B <u>or</u> the operator has submitted the required information to the Regional Administrator/Director.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage or disposal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/Director within 15 days.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

Subpart F: Groundwater Monitoring

NOTE: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:				
a) A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
c) An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES:

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. A written Closure Plan is on file at the facility and contains the following elements: (Sections 265.112 and 3745-56-03)	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
b) A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55,-56,-57,-58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.	<u> </u>	<u>X</u>	<u> </u>	<u>No. 9</u>
d) A description of steps taken to decontaminate facility equipment.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
e) The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed.	<u> </u>	<u>X</u>	<u> </u>	<u>No. 10</u>
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES.

5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

- | | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|--|------------|-----------|------------|-----------------|
| 9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10. | | | X | |

Subpart H: Financial Requirements

- | | | | | |
|--|---|--|--|--|
| 1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32). | X | | | |
|--|---|--|--|--|

NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL APRIL 13, 1982 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

3. Inspection records containing the date, time of inspection, name of inspector and notation of observations should be consolidated and included in the operating record log.
4. Areas subject to spills, such as the still recovery system, where hazardous wastes are loaded and unloaded must be inspected daily when in use. The waste in the area under the still sludge discharge tank must be removed and general housekeeping in this area improved.
5. The still and band bury operators training manual pertaining to the handling of hazardous waste should be updated to include all of the applicable elements of 40 CFR Part 265.16 (a) (b) (c).
6. Office telephone numbers of persons qualified to act as Emergency Coordinator must be included in the Contingency Plan.
7. Copies of the Contingency Plan are presently being forwarded to the appropriate emergency service authorities.

RCRA INTERIM STATUS INSPECTION FORM

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

8. The operating record should contain the common name, EPA Hazardous Waste Identification Number, physical state, estimated or actual weight or volume and EPA Handling Code for each hazardous waste in storage as per 40 CFR Part 265.73.
9. The Closure Plan must contain an estimate of the maximum amount of hazardous waste than can be treated or stored at the facility at any one given time.
10. The Closure Plan must contain an estimate of the expected year of closure or the statement "This facility does not intend to close".

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265.171, .172, .173 and 3745-56-51, -52-53).	<u>X</u>	_____	_____	_____
2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	<u>X</u>	_____	_____	_____

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56).	<u>X</u>	_____	_____	_____
4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B).	_____	_____	<u>X</u>	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).	<u>X</u>	_____	_____	_____

Subpart J: Storage in Tanks

1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 3745-56-72-B and are equipped with a waste-feet cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	_____	_____	<u>X</u>	_____
2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	_____	_____	<u>X</u>	_____
3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74).	_____	_____	<u>X</u>	_____
4. Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74).	_____	_____	<u>X</u>	_____
5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (Sections 265.193(a) and 3745-56-73-A).	_____	_____	<u>X</u>	_____
a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.	_____	_____	<u>X</u>	_____
b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.	_____	_____	<u>X</u>	_____



Re: Franklin County
OHD 004294351
01-25-0145

RECEIVED

MAR 15 1982

WASTE MANAGEMENT BRANCH
EPA, REGION IV

March 11, 1982

Mr. William Ilg
Senior Project Engineer
Columbus Coated Fabrics
P.O. Box 208
Columbus, Ohio 43216

Dear Mr. Ilg:

On February 26, 1982, your facility was re-inspected by the Ohio Environmental Protection Agency to determine if it was in compliance with Federal/State Interim Status Hazardous Waste Regulations promulgated under the Resource Conservation and Recovery Act (RCRA, Public Law 94-580).

The enclosed inspection report is self-explanatory and contains recommendations for correcting the deficiencies found during the inspection. This office requests that you provide a written response, within thirty days, to the following deficiencies/comments contained in the enclosed inspection report:

<u>PAGE</u>	<u>QUESTION NUMBER</u>	<u>REQUIREMENT</u>
2-1	4a	DOT Shipping Name
2-3	9,10	Training Plan
4-2	4	Inspection Plan
4-4	1c	Emergency Coordinator
4-4	1d	Emergency Equipment
4-4	2	Contingency Plan
4-5	1a-1d	Operating Record
4-8	1c,1e	Closure Plan

Please call (614-466-6450) if you have any questions regarding the inspection or RCRA regulations.

Sincerely,

Lundy J. Adelsberger
Environmental Scientist
Hazardous Materials
Central District Office

LJA/rr

cc: Ms. Kathleen Homer, SIO, U.S. EPA, Region V
cc: Mr. Bob Fragale, Technical Permits Section, HWFAB
cc: Ms. Paula Cotter, Inspections/Enforcement, DHM - Ohio EPA

RCRA INTERIM STATUS INSPECTION FORM

PART 1. GENERAL INFORMATION

U.S. EPA I.D. NO. OHD004294351

Facility: Columbus Coated Fabrics Address: 1280 N. Grant Avenue
 City: Columbus State: Ohio Zip Code: 43201 Telephone: (614) 225-4000
 Facility Operator: F.L. Weigleb Title: Vice President Telephone: (614) 225-6350
 Facility Owner: Borden, Incorporated Address: 180 East Broad Street
 City: Columbus State: Ohio Zip Code: 43215 Telephone: (614) 225-4000
 Type of Ownership: X Private Government State HWFAB No. 01-25-0145

Date of Inspection: February 26, 1982 Time of Inspection: (Start) 1:30 PM (Finish) 5:00 PM
 Advance Notification? No X Yes: Telephoned 1 week prior to inspection.
 Weather Conditions: Sunny - Cold

County: Franklin

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>Mr. William G. Ilg</u>	<u>Senior Project Engineer</u>	<u>614-225-6336</u>
2.	<u> </u>	<u> </u>	<u> </u>
3.	<u> </u>	<u> </u>	<u> </u>
4.	<u> </u>	<u> </u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

INSPECTOR(S)

	(Name)	(Title)	(Telephone)
1.	Lundy Adelsberger	Environmental Scientist	614-466-6450
2.			
3.			
4.			

1. Type(s) of hazardous waste site activity: A. ☒ Generation B. ☒ Storage C. ☒ Treatment
D. ☐ Transportation E. ☐ Disposal

2. Specific hazardous wastes handled at this facility (EPA HW#):

a) Listed Wastes: See Part A of permit.

b) Non-Listed Wastes: ☒ I ☒ C ☐ R ☒ E
D001 D002 D003 D004-D017

See Part A of permit.

3. Has this facility submitted a Part A Permit Application? ☒ Yes ☐ No

4. Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources?

Yes, See Remark # ☒ No

RCRA INTERIM STATUS INSPECTION FORM

5. Does this facility store, treat or dispose of any hazardous waste from any foreign sources?

_____ Yes, See Remark # _____ X No

6. Does this facility transport hazardous waste materials off-site for itself or other generators?

_____ Yes, Complete Part 3 (Transp.) X No

a) P.U.C.O. Registration Number _____

7. A brief description of site activity:

The manufacture of coated fabrics.

Site Activity:		S	T	D
Containers	I	x		
Tanks	J			
Surf. Imp.	K			
Waste Pile	L			
Land Treat.	M			
Landfill	N			
Incineration	O			
Thermal Treat.	P			
Chem/Phys/Biol	Q			
Under. Inj.	R			

REMARKS, PART 1. (GENERAL INFORMATION)

RCRA INTERIM STATUS INSPECTION FORM

PART 2. GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in compliance with the requirements of Sections 262.11 and 3745-52-11.	<u>X</u>	<u> </u>	<u> </u>	<u>No. 1</u>
2. Does this facility generate any hazardous wastes that are excluded from regulation under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections 261.6 and 3745-51-06 (recycle/reuse)?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Sections 265.1(c)(9) and 3745-55-C-9 or via operation of an elementary neutralization unit and/or wastewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Sections 262.21(a), (b) and 3745-52-21-A-B and the minimum number of copies required by Sections 262.22 and 3745-52-22.	<u> </u>	<u>X</u>	<u> </u>	<u>No. 2</u>
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A).	<u>X</u>	<u> </u>	<u> </u>	<u>No. 1</u>
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-52-32-B.	<u>X</u>	<u> </u>	<u> </u>	<u>No. 1</u>
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33.	<u>X</u>	<u> </u>	<u> </u>	<u>No. 1</u>
6. The generator meets the following recordkeeping and reporting requirements:				
a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, when applicable.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
7. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Sections 262.50 and 3745-52-50.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
8. If the generator elects to store hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under Sections 262.34 and 3745-52-34, the following requirements with respect to such storage are met:	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
a) <u>Containers</u> : the waste is stored in closed containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) The date that accumulation began is clearly marked on each container.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
c) The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
d) Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56), and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (physical separation, signs and safety) are met.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
e) Tanks: the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-B and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
f) Uncovered tanks have at least 2 feet (60 cm.) of freeboard <u>unless</u> they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
g) Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
h) Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74-D-E).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
9. The generator has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course (Sections 262.34 and 3745-52-34).	<u> </u>	<u>X</u>	<u> </u>	<u>No. 3</u>
10. The generator keeps all of the records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records (Sections 262.34 and 3745-52-34).	<u> </u>	<u>X</u>	<u> </u>	<u>No. 3</u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
11. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77) as referenced in Sections 262.34 and 3745-52-34.			<u>X</u>	

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND 3745-55-30 THRU 37 AND 3745-55-50 THRU 70 BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER PART 4 - GENERAL INTERIM STATUS REQUIREMENTS.

REMARKS, PART 2. GENERATOR REQUIREMENTS

1. This item was found to in compliance when inspected on July 20, 1981.
2. Some waste materials may require the word "waste" to be inserted ahead of the DOT shipping name. This can be verified by contacting Mr. Harold Harkins (469-5657) of the Federal Highway Administration Office located in Columbus, Ohio.
3. Mr. Ilg was unable to locate these records at the time of the inspection. The generator must provide a Personnel Training Program and maintain records on training as required by 40 CFR 265.16.

RCRA INTERIM STATUS INSPECTION FORM

PART 4. GENERAL INTERIM STATUS REQUIREMENTS

SUBPARTS INCLUDED

B: General Facility Standards
C: Preparedness and Prevention
D: Contingency and Emergency

E: Manifest/Records/Reporting
F: Ground Water Monitoring
G: Closure

H: Financial Requirements

Subpart B: General Facility Standards

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.	<u>X</u>	_____	_____	_____
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265.13(b) and 3745-55-13-B).	<u>X</u>	_____	_____	_____
3. If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).				
a) 24 hour surveillance system.	<u>X</u>	_____	_____	_____
b) Artificial or natural barrier completely surrounding the active portion of the facility.	<u>X</u>	_____	_____	_____
c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).	<u>X</u>	_____	_____	_____
d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	<u>X</u>	_____	_____	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
4. The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Sections 265.15 and 3745-55-15)		<u>X</u>		<u>No. 4</u>
a) Inspect emergency equipment.	<u>X</u>			
b) Inspect monitoring equipment.	<u>X</u>			
c) Inspect security, alarm and communications devices.	<u>X</u>			
d) Inspect process equipment (pipes, pumps, etc.).	<u>X</u>			
e) Inspect containment structures (dikes, curbs, etc.).	<u>X</u>			
f) Inspect facility for structural malfunctions (roof, floor, etc.).	<u>X</u>			
g) Inspect hazardous waste handling/loading areas each day used.	<u>X</u>			
h) Record of any malfunctions due to equipment or operator errors.	<u>X</u>			
i) Record of any hazardous waste discharges.	<u>X</u>			
5. The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.		<u>X</u>		<u>No. 3</u>
6. The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16-D-E including written job titles, job descriptions and documented employee training records.		<u>X</u>		<u>No. 3</u>
7. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).	<u>X</u>			<u>No. 1</u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) Protection from sources of ignition.	<u>X</u>	<u> </u>	<u> </u>	<u>No. 1</u>
b) Physical separation of incompatible waste materials.	<u>X</u>	<u> </u>	<u> </u>	<u>No. 1</u>
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<u>X</u>	<u> </u>	<u> </u>	<u>No. 1</u>
d) Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).	<u>X</u>	<u> </u>	<u> </u>	<u>No. 1</u>
a) Internal alarm system	<u>X</u>	<u> </u>	<u> </u>	<u>No. 1</u>
b) Access to telephone, radio or other device for summoning emergency assistance.	<u>X</u>	<u> </u>	<u> </u>	<u>No. 1</u>
c) Portable fire control equipment.	<u>X</u>	<u> </u>	<u> </u>	<u>No. 1</u>
d) Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.	<u>X</u>	<u> </u>	<u> </u>	<u>No. 1</u>
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	<u>X</u>	<u> </u>	<u> </u>	<u>No. 1</u>
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34).	<u>X</u>	<u> </u>	<u> </u>	<u>No. 1</u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35).	<u>X</u>	<u> </u>	<u> </u>	<u>No. 1</u>
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A).	<u>X</u>	<u> </u>	<u> </u>	<u>No. 1</u>
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components:	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
a) Actions to be taken by personnel in the event of an emergency incident.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
b) Arrangements or agreements with local or state emergency authorities.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	<u> </u>	<u>X</u>	<u> </u>	<u>No. 5</u>
d) A list of all emergency equipment including location, physical description and outline of capabilities.	<u> </u>	<u>X</u>	<u> </u>	<u>No. 6</u>
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53).	<u> </u>	<u>X</u>	<u> </u>	<u>No. 7</u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265.55 and 3745-55-55).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:	<u> </u>	<u>X</u>	<u> </u>	<u>No. 8</u>
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b)(1) and 3745-55-73-B-1).	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
c) The estimated (or actual) weight, volume or density of the waste material(s).	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	<u> </u>	<u>X</u>	<u> </u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
e) The present physical location of each hazardous waste within the facility.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
f) <u>FOR DISPOSAL FACILITIES</u> , the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b)(2) and 3745-55-73-B-2).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
g) Records of any waste analyses and trial tests required to be performed.	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
h) Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
2. The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

NOTE: THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41.

3. When applicable, the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
---	---------------	---------------	----------	---------------

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

4. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
--	---------------	---------------	----------	---------------

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
b) Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2).	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
5. Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B <u>or</u> the operator has submitted the required information to the Regional Administrator/Director.	<u> </u>	<u> </u>	<u> X </u>	<u> </u>
6. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage or disposal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator/Director within 15 days.	<u> </u>	<u> </u>	<u> X </u>	<u> </u>

Subpart F: Groundwater Monitoring

NOTE: THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON AND AFTER NOVEMBER 19, 1981.

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-55-90-A:				
a) A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.	<u> </u>	<u> </u>	<u> X </u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

- b) A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.
- c) An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D.

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
_____	_____	<u>X</u>	_____
_____	_____	<u>X</u>	_____

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES:

1. A written Closure Plan is on file at the facility and contains the following elements: (Sections 265.112 and 3745-56-03)
- a) A description of how and when the facility will be closed (265.112(a)(1) and 3745-56-03-A-1).
- b) A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55,-56,-57,-58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.
- c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.
- d) A description of steps taken to decontaminate facility equipment.
- e) The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed.
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates.

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
<u>X</u>	_____	_____	_____
<u>X</u>	_____	_____	_____
<u>X</u>	_____	_____	_____
_____	<u>X</u>	_____	<u>No. 9</u>
<u>X</u>	_____	_____	_____
_____	<u>X</u>	_____	<u>No. 10</u>
_____	_____	<u>X</u>	_____

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	_____	_____	<u>X</u>	_____
4. If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.	_____	_____	<u>X</u>	_____
a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.	_____	_____	<u>X</u>	_____
b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).	_____	_____	<u>X</u>	_____
c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).	_____	_____	<u>X</u>	_____

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES.

5. A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.	_____	_____	<u>X</u>	_____
6. The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.	_____	_____	<u>X</u>	_____
7. The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.	_____	_____	<u>X</u>	_____
8. The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.	_____	_____	<u>X</u>	_____

RCRA INTERIM STATUS INSPECTION FORM

9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10.

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
_____	_____	<u>X</u>	_____

Subpart H: Financial Requirements

1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32).

<u>X</u>	_____	_____	_____
----------	-------	-------	-------

NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL APRIL 13, 1982 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

4. The facility must develop and consolidate an operating record and document the inspections required by 40 CFR 265.15.
5. The addresses and telephone numbers of the emergency coordinators must be included in the Contingency Plan (SPCC plan).
6. The Contingency Plan must contain a list of emergency equipment including location, physical description and outline of capabilities as required by 40 CFR 265.52(e).
7. A copy of the Contingency Plan must be submitted to all local police departments, fire departments and hospitals as required by 40 CFR 265.53.
8. A written operating record must be developed which contains all of the information required by 40 CFR 265.73.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS (CONT.)

9. The Closure Plan must contain an estimate of the maximum amount of hazardous waste that can be treated or stored at the facility at any one given time.
10. The Closure Plan must contain an estimate of the expected year of closure or the statement "This facility does not intend to close".

RCRA INTERIM STATUS INSPECTION FORM

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: Management of Containers	L: Waste Piles	O: Incinerators
J: Management of Tanks	M: Land Treatment	P: Thermal Treatment
K: Surface Impoundments	N: Landfills	Q: Chemical/Physical/Biological Treatment

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in closed containers which are in good physical condition and are compatible with the wastes stored in them (Sections 265.171, .172, .173 and 3745-56-51,-52-53).	<u>X</u>	<u> </u>	<u> </u>	<u>No. 1</u>
2. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	<u>X</u>	<u> </u>	<u> </u>	<u>No. 1</u>

NOTE: FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRANSPORT LABELING REQUIREMENTS UNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED TO AFFIX AN ACCUMULATION DATE. (SECTIONS 262 AND 3745-52)

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
3. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 Meters) from the property line and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signs and safety) are met (265.176 and 3745-56).	<u>X</u>	<u> </u>	<u> </u>	<u>No. 1</u>
4. Incompatible waste materials are not placed in the same containers or put in contaminated containers unless it is done under completely controlled and safe conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 265.177(a), (b) and 3745-56-57-A-B).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).	<u>X</u>	<u> </u>	<u> </u>	<u>No. 1</u>

Subpart J: Storage in Tanks

1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 3745-56-72-B and are equipped with a waste-foot cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
4. Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (Sections 265.193(a) and 3745-56-73-A).	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>
b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.	<u> </u>	<u> </u>	<u>X</u>	<u> </u>



Re: Application Number 81-HW-0145
Franklin County

August 27, 1981

William Ilg
Senior Project Engineer
Columbus Coated Fabrics
P.O. Box 208
Columbus, Ohio 43216

Dear Mr. Ilg:

On July 20, 1981, Ken Humphrey of the Ohio EPA conducted an inspection of your facility, as part of the Hazardous Waste facility permit review process. Your facility was represented by Jim Mayo.

Enclosed are two forms. The one titled "TREATMENT, STORAGE AND DISPOSAL FACILITY" is a copy of the form used during the inspection to evaluate your facility.

The other form, "DEFICIENCY NOTIFICATION TABLE", relates to the "TREATMENT, STORAGE AND DISPOSAL FACILITY" form and specifies what action must be taken where deficiencies were noted. A mark in column four of the "DEFICIENCY NOTIFICATION TABLE" denotes a violation of current regulations or pinpoints areas which will be covered by regulations not yet effective. The capital letter codes in column four are explained on the last page of the "DEFICIENCY NOTIFICATION TABLE".

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

A handwritten signature in cursive script, reading "Paul Flanigan", is written over the typed name.

Paul Flanigan, P.E.
Hazardous Waste Materials Management

PF/bsr

cc: Kathleen Homer, U.S. EPA, Region V
Ken Humphrey, CDO

CERTIFIED MAIL

DEFICIENCY NOTIFICATION TABLE
ISS INSPECTION

FACILITY NO. - SPHW-0145

OWNER - BORDEN INCORPORATED

FACILITY NAME - COLUMBUS COATED FABRICS, DIV OF BORDEN MEDICAL

FACILITY LOCATION - 1250 N. KRAFFT AVE.

FACILITY CONTACT - WILLIAM C. ILLS

ISS INSPECTION DATE - 07/20/81

PHONE NO. - (414) 225-6336

Page	COLUMN I Item No.	COLUMN II OAC Reference	COLUMN III USEPA Reference	COLUMN IV See Code Following	COLUMN V Refer To ISS Remark	COLUMN VI OEPA Use
3	III A 1	3745-55-12(A)	265.12 (A)			
	2					
	B 1	3745-55-13	265.13			
	2	3745-55-13	265.13	B	/	
	3	"	"			
	C 1	3745-55-14	265.14			
	2	"	"			
	3	"	"			
	4	"	"	E	✓	
	D 1	3745-55-15	265.15			
	2	"	"			
	3	"	"			
4	4	"	"			
	5	"	"			
	6	"	"			
	7	"	"			
	8	"	"			
	E 1	3745-55-16	265.16			
	2	"	"			
	3	"	"			
	4	"	"			
	5	"	"			
	6	"	"			
	F 1	3745-55-17	265.17			
5	2	"	"			
	3	"	"			
	IV A 1	3745-55-31	265.31			
	B 1	3745-55-32	265.32			
	2	"	"			
	3	"	"			
	C 1	3745-55-33	265.33			
	2	"	"			
	D 1	3745-55-34	265.34			
	E	3795-55-35	265.35			
	V A 1	3745-55-52	265.52			

Page	Item No.	OAC Reference	USEPA Reference	See Code Following	Refer To ISS Remark	OEPA Use
12	L	1	3745-57-31	265.251		
		2	3745-57-32	265.252		
		3		265.258		
		4	3745-57-36	265.256		
		5	"	"		
		6	3745-57-37	265.257		
		7	3745-57-37	265.257		
13	M	1	3745-57-52	265.272		
		2	"	"		
		3	3745-57-53	265.273		
		4	3745-57-56	265.276		
		5	3745-57-58	265.278		
		6	3745-57-58	265.278		
		7	3745-57-59	265.279		
		8	3745-57-61	265.281		
		9	3745-57-62	265.282		
14	N	A 1	3745-57-72	265.302		
		2	"	"		
		3	"	"		
		4	"	"		
	B	1	3745-57-79	265.309		
		2	"	"		
	C	1	3745-56-03	265.112		
		2	"	"		
		3	"	"		
		4	3745-56-32	265.192		
	D	1	3745-57-82	265.312		
			3745-55-17	265.17(b)		
	E	1	3745-57-83	265.313		
		2	3745-55-17	265.17(b)		
	F	1	3745-57-84	265.314		
		2	"	"		
		3	"	"		
		4	"	"		
16	G	1	3745-57-85	265.315		
		O&P				
	I	B 1	3745-58-33	265.373		
		2	"	"		
		3	"	"		
		4	"	"		
	II	A 5	"	"		
		1a	3745-58-35	265.375		
		b	"	"		
		c	"	"		
		2a	3745-58-35	265.375		
		b	"	"		
		B 1	"	"		
		2	"	"		
		3	"	"		
		4	"	"		
		5	"	"		
17						

KEY TO CODED ITEMS (COLUMN IV)

- A. Because the inspection at this facility was conducted prior to May 19, 1981, requirements which became effective on that date were not checked. These requirements are now effective and must be met as a condition of interim status under the federal regulations and as part of the considerations for issuance of an Ohio Hazardous Waste Permit.
- B. or C. The inspection revealed a deficiency in compliance with this item, which must be satisfactorily corrected. A determination of compliance will be made in the future.
- D. The inspection revealed a violation of regulations pertaining to this item. Since the environmental consequences of this violation may be quite serious this problem must be corrected as soon as possible. We will schedule another inspection no sooner than 30 days after the date of this letter to determine if compliance has been achieved. Further steps in the permitting process will be delayed until the re-inspection.
- E. Regulations concerning this item will become effective November 19, 1981. These requirements were not addressed in the inspection, but compliance is required by November 19, in order to meet federal interim status requirements and as a part of the considerations in issuing an Ohio Hazardous Waste Permit.
- F. Inspection revealed non compliance with this item. Compliance with this item is required unless a facility has filed as a storage facility. You should either correct the deficiency listed or file an amended Part A application for a storage facility.
- G. NFPA's code requires that the tanks be located 50 feet from the property line.

STATE IDENTIFICATION NUMBER

87-HW 0145

EPA IDENTIFICATION NUMBER

04D004294351

TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A.- General Facility Standards

I. General Information:

- (A) Facility Name: COLUMBUS COATED FABRICS, DIV. OF BORDEN CHEMICAL
(B) Street: 1280 N. GRANT AVE
(C) City: COLUMBUS (D) State: OHIO (E) Zip Code: 43201
(F) Phone: 614-225-4000 (G) County: FRANKLIN
(H) Operator: F. L. WEIGLER, VICE PRESIDENT
(I) Street: Same
(J) City: _____ (K) State: _____ (L) Zip Code: _____
(M) Phone: 614-225-6350 (N) County: FRANKLIN
(O) Owner: BORDEN, INCORPORATED
(P) Street: 180 E. BROAD ST.
(Q) City: COLUMBUS (R) State: OHIO (S) Zip Code: 43215
(T) Phone: 614-225-4000 (U) County: FRANKLIN
(V) Date of Inspection: 7/20/81 (W) Time of Inspection (From) 9:30 (To) 2:15
(X) Weather Conditions: OVERCAST, RAINING

(Y) Person(s) Interviewed

William G. ILG

JIM MAYO

SAM LIZER

Title

SR. PROJ EE

TRAFFIC Mgr.

PLANT Mgr.

Telephone

614-225-6336

225-6185

225-6274

(Z) Inspection Participants

MEL HANSE, (CCF)

KEN HUMPHREY (OEPA)

DEB UNGER-RICE

Agency/Title

FIRE SUPT.

HW Sci

E. Tech

Telephone

225-6280

614-466-6450

466-6450

(AA) Preparer Information

Name

K. Humphrey

Agency/Title

OEPA

Telephone

614-466-6450

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

☒ A. Storage and/or Treatment

☒ 1. Containers (I)

2. Tanks (J)

3. Surface Impoundments (K)

4. Waste Piles (L)

☐ D. Incineration and/or Thermal Treatment
(O and P)

☐ E. Chemical, Physical, and Biological
Treatment (Q)

☐ B. Land Treatment (M)

☐ C. Landfills (N)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	—	✓	—	N/A
2. Facility expansion?	—	✓	—	N/A
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓	—	—	
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	—	✓	—	NEED WRITTEN WASTE ANALYSIS PLAN
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	—	—	✓	N/A
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	✓	—	—	
2. Artificial or natural barrier around facility?	✓	—	—	
3. Controlled entry?	✓	—	—	
4. Danger sign(s) at entrance?	—	✓	—	NEED 1 ADDITIONAL SIGN ON NORTH DOOR
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	✓	—	—	
2. Records of operator error?	✓	—	—	
3. Records of discharges?	✓	—	—	

III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>THESE RECORDS</u>
5. Safety, emergency equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>ARE KEPT BUT ARE</u>
6. Security devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>ALL OVER THE PLACE;</u>
7. Operating and structural devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>REL. CONSOLIDATE RCRA</u>
8. Inspection log?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>SPECIFIC MATERIAL</u> <u>IN ONE PLACE</u>
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
2. Job descriptions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
3. Description of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
4. Records of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
5. Have facility personnel received required training by 5-19-81?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
6. Do new personnel receive required training within six months?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
2. No smoking signs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
3. Separation and protection from ignition sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

A) Maintenance and Operation
of Facility:

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

Yes No NI* Remarks

_____ ✓ _____ _____

3) If required, does the facility
have the following equipment:

1. Internal communications or
alarm systems?

✓ _____ _____ _____

2. Telephone or 2-way radios
at the scene of operations?

✓ _____ _____ _____

3. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

✓ _____ _____ _____

Indicate the volume of water and/or foam available for fire control:

100 K GAL. WATER TOWER

C) Testing and Maintenance of
Emergency Equipment:

1. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

✓ _____ _____ FIRE CREW DOES THIS

2. Is emergency equipment
maintained in operable
conditions?

✓ _____ _____ _____

D) Has owner or operator provided
immediate access to internal
alarms? (if needed)

✓ _____ _____ _____

(E) Is there adequate aisle space for unobstructed movement? ☒

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:

Yes No NI* Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

☒

AN SPCC PROGRAM

CONTINGENCY PLAN

2. Arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

☒

THE EXISTING

3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

☒

PLAN MUST BE
MODIFIED TO

4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

☒

INCLUDE RCRA-
SPECIFIC
INFORMATION

5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

☒

*Not Inspected

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

Yes No NI* Remarks

(B) Are copies of the Contingency Plan available at site and local emergency organizations?

— ☒ —

(C) Emergency Coordinator

1. Is the facility Emergency Coordinator identified?

— ☒ —

IDENTIFIED BY
TITLE, NEED
MORE SPECIFIC
INFORMATION

2. Is coordinator familiar with all aspects of site operation and emergency procedures?

☒ —

3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

☒ —

(D) Emergency Procedures

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

— ☒ —

N/A

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

Yes No NI* Remarks

(A) Use of Manifest System

1. Does the facility follow the procedures listed in §265.71 for processing each manifest?

— ☒ —

2. Are records of past shipments retained for 3 years?

— ☒ —

N/A

(B) Does the owner or operator meet requirements regarding manifest discrepancies?

— ☒ —

N/A

C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

✓

2. Does the operating record contain the following information:

**b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

✓

c. The location and quantity of each hazardous waste within the facility?

✓

IN PART "A"

***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

✓

N/A

e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

✓

f. Reports detailing all incidents that required implementation of the Contingency Plan?

✓

N/A yet

g. All closure and post closure costs as applicable? (Effective 5-19-81)

✓

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities.

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	<input checked="" type="checkbox"/>			<i>NEED A CLOSURE PLAN</i>
2. Has this plan been submitted to the Regional Administrator	<input checked="" type="checkbox"/>			
3. Has closure begun?	<input checked="" type="checkbox"/>			
4. Is closure estimate available by May 19, 1981?	<input checked="" type="checkbox"/>			
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981).				

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

**I
USE AND MANAGEMENT OF CONTAINERS**

Facility Name: CCF Date of Inspection: 7/20/81

	Yes	No	NI*	Remarks
1. Are containers in good condition?	<input checked="" type="checkbox"/>			
2. Are containers compatible with waste in them?	<input checked="" type="checkbox"/>			
3. Are containers stored closed?	<input checked="" type="checkbox"/>			
4. Are containers managed to prevent leaks?	<input checked="" type="checkbox"/>			
5. Are containers inspected weekly for leaks and defects?	<input checked="" type="checkbox"/>			
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	<input checked="" type="checkbox"/>			

Yes No NI* Remarks

7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)

N/A

8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?

N/A

J
TANKS

Facility Name: _____

Date of Inspection: _____
N/A

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?

N/A

2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?

N/A

3. Do continuous feed systems have a waste-feed cutoff?

N/A

4. Are waste analyses done before the tanks are used to store a substantially different waste than before?

N/A

5. Are required daily and weekly inspections done?

N/A

6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

N/A

7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)

N/A

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(See table 2-1 through 2-6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

N/A

K
SURFACE IMPOUNDMENTS

Facility Name: _____

Date of Inspection: _____

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?

2. Do earthen dikes have protective covers?

3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?

4. Is the freeboard level inspected at least daily?

5. Are the dikes inspected weekly for evidence of leaks or deterioration?

6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)

_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

N/A

WASTE PILES

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from dispersal by wind?	_____	_____	_____	_____
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	_____	_____	_____	_____
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)	_____	_____	_____	_____
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	_____	_____	_____	N/A
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	_____	_____	_____	_____
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)	_____	_____	_____	_____
7. Are piles of incompatible waste protected by barriers or distance from other waste?	_____	_____	_____	_____

*Not Inspected

LAND TREATMENT

Facility Name: _____

Date of Inspection: _____

1. Is treated hazardous waste capable of biological or chemical degradation?

2. Are run-off and run-on diverted from the facility or collected? (Effective date: November 19, 1981)?

3. Is waste analyzed according to 265.273?

4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?

5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?

6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?

7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?

8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)

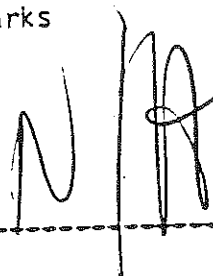
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies)

N/A

N
LANDFILLS

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
(A) General Operating Requirements				
Does the facility provide the following:				
**1. Diversion of run-on away from active portions of the fill?	---	---	---	
**2. Collection of run-off from active portions of the fill?	---	---	---	
**3. Is collected run off treated?	---	---	---	
4. Control of wind dispersal of hazardous waste?	---	---	---	
(**Effective 11-19-81)				
(B) Surveying and Recordkeeping				
Does the Operating Record Include:				
1. A map showing the exact location and dimensions of each cell?	---	---	---	-----
2. The contents of each cell and the location of each hazardous waste type within each cell?	---	---	---	-----
(C) Closure and Post-Closure				
1. Is the Closure Plan available for inspection by 5-19-81?	---	---	---	-----
2. Has this plan been submitted to the Regional Administrator?	---	---	---	-----
3. Has closure begun?	---	---	---	-----
4. Is closure cost estimate available by 5-19-81?	---	---	---	-----
(D) Special requirements for ignitable or reactive waste				
Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?				
	---	---	---	-----

Yes No NI* Remarks

(If waste is rendered non-reactive or non-ignitable see treatment requirements)

If not, the provisions of 40 CFR 265.17(b) apply.

[Handwritten signature]

E) Special Requirements for Incompatible Wastes.

Does the owner or operator dispose of incompatible wastes in separate cells?

If not, the provisions of 40 CFR 265.17(b) apply.

F) Special requirements for liquid waste (effective 11-19-81)

1. Are bulk or non-containerized liquids placed in the landfill?

2. Does the landfill have a chemically and physically resistant liner system?

3. Does the landfill have a functional leachate collection system?

4. Are free liquids stabilized prior to or immediately after placement in the landfill?

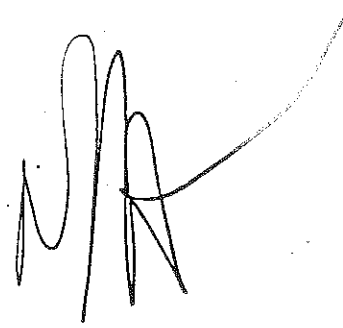
G) Special requirements for Containers (effective 11-19-81)

Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?

O and P
INCINERATION and THERMAL TREATMENT

(A) Facility Name: _____

(B) Date of Inspection: _____



I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment): _____

B. Components and steady state condition:

**** Was this component at SS prior to adding waste?

Component	Yes	No	NI*	Remarks
1. _____	_____	_____	_____	_____
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

1. Required analyses; has an analysis been performed for the following?	Yes	No	NI*	Remarks
a. Heating value	_____	_____	_____	_____
b. Halogen content	_____	_____	_____	_____
c. Sulfur content	_____	_____	_____	_____

Not Inspected

Yes No NI* Remarks

2. Has documented or written data been substituted for analysis of either:

a. Lead?

b. Mercury?

List other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

Remarks

1. _____

2. _____

3. _____

4. _____

5. _____

III. Monitoring and Inspections

Yes No NI* Remarks

Are combustion/emission control instruments monitored at least every 15 minutes?

Is steady state maintained or corrections attempted?

Is stack plume observed at least hourly for normal color and opacity?

Did any stack observations made by owner or operator show a plume different than normal?*

If yes to D above, were corrections made to return emissions to normal appearance?*

Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?

Are emergency shutdown controls and system alarms checked daily for proper operation?

NI

*Not Inspected

*Specify in Remarks for what period of time this was checked.

IV. Open Burning

A. Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI*	Remarks
1. Does this facility burn <u>only</u> waste explosives? (A No answer means <u>other</u> hazardous waste is open-burned.)	_____	_____	_____	_____
2. If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	_____	_____	_____	_____

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,001 to 30,000.....	690 m	2,260 ft

N/A

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	_____	_____	_____	_____
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	_____	_____	_____	_____

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>
4. Are inspection procedures followed according to 265.403?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are the special requirements fulfilled for ignitable or reactive wastes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Name, mailing address, telephone number, and EPA ID Number of Generator	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Does the owner or operator submit exception reports when needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A yet

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) If required, are placards available to transporters of hazardous waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	*NI*	Remarks
1. Are containers marked with start of accumulation date?	_____	_____	_____	_____
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	_____	_____	_____	_____
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	_____	_____	_____	_____
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	_____	_____	_____	_____
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	_____	_____	_____	_____
c. Do continuous feed systems have a waste-feed cutoff?	_____	_____	_____	_____
d. Are required daily and weekly inspections done?	_____	_____	_____	_____
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	_____	_____	_____	_____
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	_____	_____	_____	_____

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	___	___	___	N/A
(B) Has the generator submitted Annual Reports and Exception Reports as required?	___	___	___	

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

Has the installation imported or exported Hazardous Waste?

___ ☒ ___

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:				N/A
a. Notified the Administrator in writing?	___	___	___	
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	___	___	___	
c. Met the Manifest requirements?	___	___	___	
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?	___	___	___	

*Not Inspected

X
TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?

- Yes No NI* Remarks

N/A

II. INTERNATIONAL SHIPMENTS

A. Does the transporter record on the manifest the date the waste left the U.S.?

B. Are signed completed manifest(s) on file?

V. MISCELLANEOUS

A. Does transporter transport hazardous waste into the U.S. from abroad?

B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

*Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

FORM 1 GENERAL		ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION (Read the "General Instructions" before starting.)		EPA I.D. NUMBER	
I. EPA I.D. NUMBER		PLEASE PLACE LABEL IN THIS SPACE		F O H D 0 0 4 2 9 4 3 5 1 3 D	
III. FACILITY NAME					
V. FACILITY MAILING ADDRESS					
VI. FACILITY LOCATION					

GENERAL INSTRUCTIONS
If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

SPECIFIC QUESTIONS		MARK 'X'		SPECIFIC QUESTIONS		MARK 'X'	
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY	
1	SKIP COLUMBUS COATED FABRICS

IV. FACILITY CONTACT	
A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 ILG WILLIAM G SENIOR PROJ ENG	614 225 6336

V. FACILITY MAILING ADDRESS			
A. STREET OR P.O. BOX	B. CITY OR TOWN	C. STATE	D. ZIP CODE
3 P O BOX 208	COLUMBUS	OH	43216

VI. FACILITY LOCATION								
A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER		B. COUNTY NAME		C. CITY OR TOWN		D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
1280 NORTH GRANT AVENUE		FRANKLIN		COLUMBUS		OH	43201	049

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND									
7	2	2	9	5	(specify)	7				(specify)									
Coated Fabrics, Not Rubberized																			
C. THIRD										D. FOURTH									
7					(specify)	7				(specify)									

VIII. OPERATOR INFORMATION

A. NAME										B. Is the name listed in Item VIII-A also the owner?									
8	B	O	R	D	E	N	I	N	C	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO									
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)										D. PHONE (area code & no.)									
F = FEDERAL S = STATE P = PRIVATE M = PUBLIC (other than federal or state) O = OTHER (specify)										A 6 1 4 2 2 5 4 0 0 0									
E. STREET OR P.O. BOX																			
1 8 0 EAST BROAD STREET																			
F. CITY OR TOWN										G. STATE		H. ZIP CODE		IX. INDIAN LAND					
B C O L U M B U S										O H		4 3 2 1 5		Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO					

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)									
9	N									9	P								
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)									
9	U									9	Z								
										M I S C (specify)									
C. RCRA (Hazardous Wastes)										E. OTHER (specify)									
9	R									9									
										(specify)									

State Permits Attached

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Manufacture of Coated Fabrics

F9A/50

F9/50

F9A/51

III. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Robert W. Guthrie, President Borden Chemical	<i>Robert W. Guthrie</i>	11/17/80

COMMENTS FOR OFFICIAL USE ONLY

Form 3510-1 (6-80)	REVERSE

FORM 3	EPA	ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	I. EPA I.D. NUMBER FOH D 004 29435131
--------	-----	---	--

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
23	24 - 29	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

<input checked="" type="checkbox"/> 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)	<input type="checkbox"/> 2. NEW FACILITY (Complete item below.)
71	71
FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)	FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN
8 29 01 01	

B. REVISED APPLICATION (place an "X" below and complete Item I above)

<input type="checkbox"/> 1. FACILITY HAS INTERIM STATUS	<input type="checkbox"/> 2. FACILITY HAS A RCRA PERMIT
72	72

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or inciner- ators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)				1. AMOUNT	
X-1	S 02	600		5			
X-2	T 03	20		6			
1	T 04	390,000		7			
2	T 04	19,200,000		8			
3	T 01	22,200,000		9			
4	S 01	10,450,000		10			

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR F

DESCRIBING OTHER PROCESSES (code "T04")

OR EACH PROCESS ENTERED HERE

Line #1 Solvent recovery is a two stage operation. In the first stage, solvent is removed from scrap ink. In the second stage, water introduced by the first operation is removed from the solvent.

Line #2 Plating discharge treated to precipitate chrome and copper which is then removed in throw away filters.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE
POUNDS P
TONS T

METRIC UNIT OF MEASURE CODE
KILOGRAMS K
METRIC TONS M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
W 0 H D 0 0 4 2 9 4 3 5 1 3 1													W DUP 3 2 DUP												
V. DESCRIPTION OF HAZARDOUS WASTES (continued)																									
LINE NO.	A. EPA HAZARD. WASTENO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																					
				1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))																	
1	F 0 0 1	850 000	P	S 0 1																					
2	F 0 0 5	150 000	T	T 0 4	S 0 1																				
3	F 0 0 2																								Included with above
4	F 0 0 3																								Included with above
5	F 0 0 6	150 000	T	T 0 1	T 0 4	S 0 1																			
6	F 0 0 9																								Included with above
7	P 0 0 1	500 000	P	S 0 1																					
8	P 0 2 9	200 000	P	S 0 1																					
9	P 0 3 0																								Included with above
10	P 0 9 0	100 000	P	S 0 1																					
11	P 0 9 8	500 000	P	S 0 1																					
12	P 1 0 6	500 000	P	S 0 1																					
13	U 0 1 3	1,000 000	P	S 0 1																					
14	U 1 5 1	100 000	P	S 0 1																					
15	D 0 0 1	1,000 000	P	S 0 1																					
16	D 0 0 2	3,000	T	S 0 1																					
17	D 0 0 5	1,000	T	S 0 1																					
18	D 0 0 6																								Included with above
19	D 0 0 7	21,000	T	S 0 1																					
20	D 0 0 8																								Included with above
21	D 0 0 5	105 000	T	S 0 1																					
22	D 0 0 6																								Included with above
23	D 0 0 7																								Included with above
24	D 0 0 8																								Included with above
25																									
26																									

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

S	F	O	H	D	0	0	4	2	9	4	3	5	1	3	6
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

F6A/55

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

F6N/56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

3	9	5	9	2	3	0
65	66	67	68	69	70	71

0	8	2	5	9	4	3	0
72	73	74	75	76	77	78	79

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

Borden Inc.

614-225-4292

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

180 E. Broad St.

Columbus

OH

43215

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)
Robert W. Gatheil, President
Borden Chemical

B. SIGNATURE
Robert W. Gatheil

C. DATE SIGNED
11/17/80

OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

B O R D E N I N C

180 EAST BROAD STREET • COLUMBUS, OHIO 43215



ROBERT W. GUTHEIL
EXECUTIVE VICE PRESIDENT

August 7, 1980

TO WHOM IT MAY CONCERN:

This will authorize W. Bailey Barton, Director, Environmental Affairs, to sign USEPA Form 8700-12, notifying USEPA of Hazardous Waste Activity in Chemical Division of Borden, Inc.

R. W. Gutheil
Executive Vice President
Borden, Inc.